elements within OTFM. The OTFM conversion and implementation staff worked on a daily basis with SEI Investment's professional conversion team in the OTFM's central office in Albuquerque, New Mexico, and in the Western Regional office in Phoenix, Arizona, the pilot site. The initial conversion and implementation team planning session occurred during the week of April 13 - 20, 1998. During this session, firm conversion dates for all BIA Regions were established and, based on contractor advice, the decision to add two additional small Regions to enable testing of inter-Regional processes was made. *This task was completed April 20, 1998.*

I. Acquire External Professional Consulting Services to Assist in Implementation

OST uses the services of external consultant services during the conversion and implementation effort to provide third party oversight and advice regarding the effort.

In February 1999, an existing contract with Macro, International was amended to provide technical assistance on the TFAS conversion efforts. A consultant from Macro with extensive SEI product experience has been on site in Albuquerque since March 1999 working with OTFM staff on pre-and post-conversion efforts.

J. Develop and Implement Conversion Strategy

Conversion teams from OTFM and SEI Investments worked together to develop a comprehensive conversion strategy, using SEI Investments' proven models from previous conversion efforts in the commercial sector, coupled with OTFM's experience gained in the conversion of Tribal accounts in 1995. The team mapped data needed to populate the SEI trust funds accounting application and developed automated routines for data conversion. The conversion strategy included two "mock" conversions as test beds before final conversion in August 1998. In addition, a formal "dress rehearsal" involving all field staff using formal scripts with test transactions was conducted for a full day shortly before each Regional conversion to familiarize staff with TFAS. *Conversion planning was completed June 23, 1998, and execution of the strategy began July 31, 1998.*

K. Train Support and User Personnel

As of February 2000, 285 OTFM, 275 BIA, 114 Tribal, 30 contractor, and 8 Farmington Indian Minerals Office personnel have been trained. User training is scheduled and completed approximately one month prior to implementation of the new Trust Funds

Accounting System in each Region, in a "just-in-time" approach to ensure user retention of the training information and skills. Refresher training is also provided on an "as needed" basis. Additionally, all OST employees are provided "hands on" experience at OTFM in Albuquerque prior to conversion of their Region. An extensive help desk was provided by SEI Investments and *training of the Western, Pacific, and Alaska Regions, and OTFM staff was completed on schedule by August 31, 1998.*

L. Verify and Convert Data

In conjunction with the Conversion Strategy and execution described in J above, IIM account data that was converted to the new Trust Funds Accounting System was verified, and converted in a deliberate, controlled environment to assure high quality data. *This effort was completed August 31, 1998.*

M. Acquire and Distribute End User Work Stations to Field

The existing inventory of hardware was found to be inadequate to meet functional requirements. The workstation equipment planned for use is a combination of existing equipment available, upgraded to specification, and newly purchased equipment.

The configuration for these workstations includes user software (word processing, spreadsheet, data base, presentation, e-mail, etc.) and software required to communicate with both Local Area Networks and Wide Area Networks. It also covers the hardware required for local use, printers, communications, security, and user documentation, installation, and on-going maintenance costs. Help Desks were organized by application discipline (i.e., TFAS, TAAMS, LRIS) and established to provide on-going technical and application support for Tribal, OST and BIA system users via a toll free telephone number.

The OST has ensured that all of its staff in the Field and Central Office have adequate PC's for the TFAS/TAAMS systems. All OST/OTFM staff have at least a 233 MHz Pentium II PC with a standard office suite and emulation software. These machines meet the standards established by the Information Resource Management Review Council. This task was completed August 31, 1998. Procurement action is underway to provide similar hardware and software to the appropriate Tribal entities.

N. Initiate and Pilot New Trust Funds Accounting System

Conversion of the Western pilot site to the new Trust Funds Accounting System was *completed August, 1998.* An added control feature was introduced into Indian trust accounting operations with the

conversion to TFAS. This included centralization of accounting, data entry, and quality assurance functions in the Office of Trust Funds Management's Albuquerque headquarters. Such cash-entry centralization is considered a standard in the commercial sector. This change necessitated realignment of the field staff and their job duties, and staff increases to OTFM's Accounting Division, based on formal studies by an external contractor, Macro International. Conversions of the pilot sites were planned to occur at the month-end and during weekends to promote easier interfacing with SEI Investments and DOI support systems, as well as to allow maximum time for conversion, testing, reconciling and last minute data cleanup.

O. Convert Alaska and Pacific Region

Conversion of the Alaska and Pacific Regions was completed concurrent with conversion of the Western Region on August 31, 1998.

P. Convert Southwest and Navajo Regions

TFAS conversion at the Southwest and Navajo Regions sites were completed in January, 1999.

Q. Convert Tribal Accounts and the IIM Pool to New Trust Funds Accounting System

The 1,322 Tribal Accounts that resided on the OMNITRUST trust accounting system, plus the IIM Investment Pool, were converted to the new Trust Funds Accounting System operated by SEI Investments. *As of February 28, 1999 all tribal accounts and the IIM pool account were successfully converted to the TFAS system operated by SEI investments.*

R. Convert Eastern Region

The Eastern Region was converted in April, 1999.

S. Convert Rocky Mountain Region

The Rocky Mountain Region was converted May, 1999.

T. Complete Data Cleanup for Remaining Conversion Sites

The OST contractor, DataCom Sciences, Inc., completed the cleanup of IIM trust administrative documents contained in the IIM jacket folders in its possession in July 1999. A quarantine imposed due to a Hanta Virus threat produced a two week delay at the DataCom facility. However, not all Agency records were released to OTFM as scheduled due to tribal intervention. The Winnebago, Standing Rock, Pine Ridge and Umatilla Agencies did not ship their IIM jacket folders. (Winnebago has since released the IIM jacket folders.) The Office of Trust Litigation Support and Records negotiated with the remaining three Tribes at those Agencies in an attempt to secure the release of the IIM jacket folders for data prior to the conversion of the files for their Areas. *Discussions took place but no resolution has occurred.*

The current schedule provides for a deployment in line with the conversion schedule below. To date, over 191,000 accounts have been converted in the Western, Alaska and Pacific Region pilot areas, Southwest, Navajo, Eastern, Rocky Mountain, Midwest, and Great Plains Regional offices, and for Tribal accounts.

TFAS DEPLOYMENT SCHEDULE

BIA REGION	DATE
Alaska Region	August 1998
Pacific Region	August 1998
Western Region	August 1998
Southwest Region	January 1999
Navajo Region	January 1999
OMNI Trust (tribal trust accounts and IIM pool account)	February 1999
Eastern Region	April 1999
Rocky Mountain Region	May 1999
Midwest Region	July 1999
Great Plains Region	October 1999
Southern Plains Region	March 2000
Eastern Oklahoma Region	March 2000
Northwest Region	March 2000
Stabilizing and Adjustment	April - May 2000

U.   Convert Midwest Region

The Midwest Region was converted July 29, 1999.

V.   Convert Great Plains Region

The Great Plains Region was converted October 30, 1999.

W.   Deploy TFAS to Remaining Sites

As reflected in the table above, conversion of the Southern Plains, Eastern Oklahoma and Northwest Regions is scheduled to be completed no later than March 31, 2000.

X. Stabilize and Adjust

The period *April - May 2000* will be used to stabilize and make any final adjustments with regard to the TFAS system and the overall conversion effort.

6. TRUST ASSET AND ACCOUNTING MANAGEMENT SYSTEM (TAAMS)

I   Responsible Official

The BIA Deputy Commissioner for Indian Affairs is the responsible official for this subproject. Dominic Nessi, Special Assistant to the Assistant Secretary for Indian Affairs, is the subproject manager responsible for coordinating work occurring at BIA Headquarters, Regional and Agency offices.

II   Statement of the Problem

The basic tools that DOI uses to manage Indian trust assets must be upgraded. Proven automated application sources for many of these basic trust functions are commercially available.

The Trust Asset and Accounting Management System (TAAMS) that will replace existing systems is comprised of a modified commercial off-the-shelf general trust asset management system. The TAAMS system will include master lease, billing and accounts receivable, collection subsystems, and land title functions.

Legacy Systems
There are currently two BIA-wide automated systems used to manage Indian trust assets: the Land Records Information System (LRIS), and the Integrated Records Management System (IRMS).

LRIS supports the land title function by providing land title-related information e.g. ownership and encumbrances. It calculates ownership interests (in fractional and decimal forms) used by Agencies for distribution of land revenue.

IRMS supports the land resource management function and is primarily used at the Agency level for generating lease bills and for income/revenue distribution to Indian owners. It contains information on Indians (People File), Leases (i.e., pasture, range, timber, mineral mining), land ownership, oil and gas royalties, and IIM accounts.

Several of the Regions use locally developed and maintained systems to support the leasing and disbursement process. Others perform this function manually and do not use any automated systems.

Legacy System Shortcomings
The information contained in each of these modules is entered manually, contains duplicate data elements, and is not integrated or cross-checked for consistency. As a result, the same data has the potential of being inconsistently maintained by each module.

LRIS and IRMS are not integrated, have no electronic interfaces and duplicate much of the same information (i.e., ownership, land, and leases/encumbrances). This increases the chance of data-entry errors and the potential for inconsistency in the information contained in each system. Neither LRIS nor IRMS fully or adequately support all the activities of the land title and resource management functions performed at the Land Title Records Office (LTRO) or Agency levels.

Observations on TAAMS Initiative

The original plan for modification and deployment of TAAMS has undergone considerable change since the unveiling of the initial prototype in June 1999. Much of this change has occurred as the project has evolved and the system requirements have become better defined by the user community.

The original HLIP and the TAAMS contract foresaw the purchase of an off-the-shelf system with minor modification. This approach was intended to "jump-start" development activity as quickly as possible. From that perspective, the Department's approach was effective. However, initiating such a quick development effort required that a special effort be made to ensure that critical information engineering tasks be conducted concurrently or, in some cases, out of sequence with a traditional system development method. Because the contract lacked specific design requirements, the Department acknowledged that its risk could be far greater than would normally be found in a more traditional information technology initiative. However, when weighed against the risk of delay associated with traditional system development methods, the Department believes that it chose the proper course of action and that proper risk mitigation could be accomplished. Listed below is a series of observations based on the experience gained during the first year of the TAAMS initiative.

As a result of a limited amount of pre-planning and development of a precise design specification and requirement, the BIA chose to modify TAAMS using an "evolutionary prototyping" method for rapid development. This method is a user-centric design effort that allows for the development of numerous system releases, each one closer to the final target than the last. This is an accepted process for rapid system development and helps to ensure that the user community has a significant opportunity for input on the design.

One of the most important observations made after the first prototype was released in mid-summer 1999 was that the initial design meetings did not fully capture the entire scope of the BIA's needed functionality. Furthermore, it became apparent that the lack of consistent business rules and processes across the BIA (many resulting from statutes and probate laws that vary from state to state) placed the software vendor in a very difficult position as it attempted to modify the software to meet the BIA's needs. Although it was always assumed that additional adjustments would be necessary after the first prototype, it was initially believed that a large part of the basic functionality was present in the late-June 1999 release of TAAMS. This was not the case and it became apparent during the system tests conducted with BIA users during July and August 1999 that a significant level of analysis and system modification remained in order to ensure that all of the BIA's unique business functions were addressed.

The combined impact of these two factors was that many more releases would be necessary than originally anticipated when the initial prototype was released. Throughout this period, the TAAMS team would project that the "next" version would satisfactorily meet the core functionality of the users, only to find that the users determined that additional modification was

necessary. It should be noted that BIA staff have limited experience in system design and it is not surprising that they would not be able to articulate their needs without a significant level of interaction with the software vendor – a level of interaction that often competed with other pressing demands for their time.

As a result, in order to more clearly define the core requirements, the software vendor and TAAMS team began to focus primarily on the needs of the Billings Regional Office with a reduced level of input from other BIA regions. Chosen as the pilot, Billings represented a good target for TAAMS because their workload represented the overwhelming majority of types of realty transactions and their workforce followed the most common BIA realty practices.

An unanticipated result of the frequent version releases was that the data migration did not have a consistent target from July 1999 through approximately September 1999. As a result, test conversions would have to be adjusted every time the underlying data structure was adjusted. With versions being released in a rapid manner, there were times when system testing was difficult because the data did not properly match the data structure.

Furthermore, while the Billings data was sufficient for the legacy systems, it required significant modification for the TAAMS database structure. For example, fee owners in the legacy system did not need a unique identifier. However, in TAAMS, a unique identifier was necessary to ensure database normalization. This necessitated both an immediate business rule decision and a conversion process that would create a unique identifier. Each time a new

version was released, all of these features would need to be reviewed to ensure that they did not conflict with some aspect of TAAMS previously decided upon.

Another unanticipated result of the design effort was that it did not lend itself to system testing in the traditional sense. Testing was conducted continuously after each version was released. However, the data conversion issues discussed above oftentimes interfered with a full test. Unit, integration and system testing was conducted routinely by the software vendor throughout the modification process.

Similarly, training was conducted frequently during the summer and early fall 1999 for BIA regional personnel with the expectation that the last release would be the final release. Training often illustrated that the latest release did not meet the user's needs and also that business rules continued to need refinement. An important lesson learned during the training effort was that the legacy systems and TAAMS were so different in approach, technology and concept that longer, more intensive training classes than originally considered would be required. A new concept for training emerged that is now being implemented. A central facility will be used for all training – the Applied Terravision System, Inc. (ATS) facility in Dallas – with the instructors provided by ATS. BIA co-trainers will be available to answer questions about the business aspects of TAAMS, whereas ATS instructors will teach the proper use of the software.

The net result of these events during the late summer and early fall was that the deployment schedule outlined in the TAAMS contract could not be achieved as

originally planned. In retrospect, the Department concedes that the plan was overly optimistic given the complexity of the task at hand. Nonetheless, the progress achieved could not have been accomplished without this direct attack on the problem and, of course, the initiative and cooperation of hundreds of BIA staff and contractor employees across the country.

Other Observations

An aspect of the TAAMS initiative that does not fall under TAAMS per se, but certainly has a major impact on the performance of the system, is the BIA's telecommunications infrastructure. In the process of being upgraded as TAAMS was being deployed to Billings, the BIA's wide-area network (BIANET) has posed some performance issues. The frame relay wide-area network should eventually provide the necessary framework for a successful telecommunications structure. However, "band-width" is not the only part of the equation that must be addressed. BIA local area networks, routers, and even the desktop PCs must be properly "tuned" to meet the requirements of a high performance software product that transfers large quantities of data for processing. This analysis and upgrade continues to the extent that resources are available. Continued improvement in the BIANET must be an integral component of a successful TAAMS initiative. In order to address the performance issues of BIANET, the Department is developing a comprehensive approach to addressing network issues, using Departmental, BIA and contracting staff to thoroughly review, analyze and correct outstanding network

issues. An initial plan has been delivered to the BIA and the contractor has begun gathering initial network information.

The Department's trust business processes need substantial review and standardization in order to take advantage of the efficiencies and flexibilities provided by modern software. This review process, like TAAMS, is on a fast-track for completion. However, given that the policies and procedures subproject has not yet reached key conclusions, the TAAMS design team working with the system owner and user community had to make basic programmatic assumptions that may eventually require further system modification. The benefit of TAAMS is that its flexible design will allow for such changes.

The interface between TAAMS, TFAS and MMS is complicated, not from a technology perspective, but because the three systems have different owners, different software vendors and different program objectives. In retrospect, the plan to purchase two off-the-shelf systems independently (TAAMS and TFAS) and interface them with an existing system (MMS) had inherent difficulties from its inception. This challenge will be met, but it will require significant interaction between the organizations at both the upper management and system levels in the next two to three months.

The information management culture in the BIA must be modernized to understand how modern information systems are managed. The TAAMS initiative has spawned the creation of configuration management and control boards, a field user group, the BIA's first full-time system manager and a system of regional data administrators. While

these components will some day be commonplace in BIA, today management and staff are just beginning to learn new concepts and processes and taking on new responsibilities for data and system management.

Through TAAMS, the BIA created an internal capacity for IT project management that it did not previously have. The Department of Interior does not have standards for IT project management, necessitating the BIA to develop its own standards as the initiative proceeded. As a result, BIA will reap future benefits as it continues to develop and manage IT projects. The "cost" was that the TAAMS Project Management Team was required to create a series of plans and documents for the management of TAAMS. This was a time and resource consuming activity that future project management efforts will not have to undertake.

Data conversion at future BIA and tribal sites will continue to be a challenge. Because each BIA office modified the legacy systems to fit their own needs and each legacy database is different, the TAAMS team cannot develop just one "data map" to fit all circumstances. Tribes which have already developed their own systems will have an even greater challenge.

The challenge will be for the TAAMS project team to develop a replicable process based on the experiences from the Rocky Mountain Region pilot. This task is achievable, but it will take a significant level of coordination between different contractors and the BIA users.

III   Statement of Objectives and Outcomes

Over the last several years, BIA has undertaken several efforts to evaluate updating or replacing the current LRIS system. In 1998, a decision was made - predicated on an LRIS study by TRW and Lockheed-Martin - to replace LRIS with modern software. Initially LRIS was to have been developed in tandem with the new TAAMS. Subsequently, a decision was made to eliminate LRIS completely and include its functionality in TAAMS based on the following:

- The current LRIS system does not efficiently support BIA processes and is partly responsible for bottlenecks and backlogs related to title information;

- Significant problems are caused by the lack of integration of the current LRIS and IRMS systems (TAAMS is now planned as the replacement for IRMS and LRIS). For example, ownership and lease information must be entered manually in both systems as separate efforts;

- There is significant duplication of data between these two systems without any capability to transfer or synchronize data automatically. As a result, the data is inconsistent between the two systems and there is no efficient way at present to resolve these inconsistencies;

- The LRIS system is based on obsolete technology that is very costly to enhance or repair.

The BIA, in cooperation with the Office of the Special Trustee (OST) and in coordination with the Department's CIO and

Office of Information Resources Management, BLM and MMS, is acquiring, modifying (as necessary), testing and piloting standardized, commercial off-the-shelf land management system software. Interfacing with the Trust Funds Accounting System described above, this trust management system will comprise TAAMS. The TAAMS system will include an asset management system with a master lease subsystem, a billing and accounts receivable subsystem, and a collection subsystem. TAAMS will also have a probate tracking system in a future release.

A pilot site (Rocky Mountain Region/Billings, MT) was identified and the site's data has been cleaned and converted. The conversion process used both internal and contractor support. The approach used procurement and piloting protocols appropriate to a proven, modified commercially leased, operated, and maintained off-the-shelf standard trust asset management system, to process trust data generated nationally from over 221 BIA and Tribal field locations. The system selected will be commercially operated and maintained. Prior to the decision to extend the system nationally, the system will be piloted successfully at the Rocky Mountain Regional Office.

IV Relationship to Reform Act of 1994

TAAMS will help to address the following provisions of the American Indian Trust Fund Management Reform Act of 1994 (Section 101):

- Providing adequate systems for accounting for and reporting trust fund balances.

- Providing adequate controls over receipts and disbursements.

- Providing periodic, timely reconciliations to assure the accuracy of accounts.

- Determining accurate cash balances.

- Preparing and supplying account holders with periodic statements of their account performance and with balances of their account which shall be available on a daily basis.

- Appropriately managing the natural resources located within the boundaries of Indian reservations and trust lands.

- Preparing accurate and timely reports to account holders on a periodic basis regarding all collections, disbursements, investments, and return on investments related to their trust accounts.

- Maintaining complete, accurate and timely data regarding the ownership and lease of Indian lands.

V Relationship to Other HLIP Subprojects

BIA Data Cleanup and TAAMS activities are closely related and for that reason these two subprojects are being jointly managed.

From a system perspective, TAAMS has its closest link to TFAS owing to the need for consistent data for individual Indian or Tribal accounts that are common to both systems and to accommodate transactions that have an impact on accounts in both systems.

Other subprojects that have significant effects on TAAMS include Probate (changes affecting status of data and accounts), Records Management (storage and disposition of information), Policies and Procedures (multifaceted effects), Training (proper use of system, reporting protocols, data entry rules, etc.), and Internal Controls (findings and recommendations for improvement and risk reduction).

VI Subproject Budget

The estimated project budget for TAAMS includes system modification, development and deployment; training services; service bureau operations and other costs associated with the on-going operation of TAAMS.

SUBPROJECT BUDGET TAAMS				
Fiscal Year	FY 1997/ 1998	FY 1999	FY 2000	FY 2001
$$ in millions	—	8.1	18.4	12.9

VII Subproject Action Plan

The particular tasks and milestones necessary to successfully complete this subproject include the following:

A. Select Pilot Site

A decision was made in 1997 to pilot and test the new Trust Asset and Accounting

Management System (TAAMS) initially at one BIA Regional Office location before the system is installed at all BIA and OST locations. The BIA and OST jointly developed criteria for selection of a suitable system pilot site, considering the following:

- Whether the Area was representative in terms of Tribal, IIM and Special Deposit accounts, trust assets and land management issues, Tribal contracting, and income types;

- Information about the status of previous or on-going records cleanup efforts in the areas of trust management records, BIA trust asset and land title records; and Hearings and Appeals probate backlogs;

- The general receptivity of Area Management and Indian representatives;

- Staff knowledge of automation, policies and procedures, trust management, etc.;

- Logistical considerations such as telecommunications, geography, and costs.

This task was completed on November 13, 1997, with a decision by the Secretary's Trust Management Improvement Steering Committee to use the Rocky Mountain Region for the pilot site.

B. Acquire External Professional Consulting Services

Three Native American 8(a) management/ technology firms were selected in December 1998 to provide day-to-day support to the TAAMS project team. An additional firm was procured to provide

assistance in developing data dictionaries and data conversion techniques. The BIA will continue to utilize outside assistance as it becomes necessary to supplement internal resources. *All external consulting services were procured on schedule by March 31, 1999.*

C. Assemble Senior BIA and OST Management Team to Develop Requirements

Senior BIA and OST managers and representatives of BIA's trust resource operations, the Department CIO, BLM, MMS and servicing procurement officials outlined and documented, at a high level, the TAAMS functional requirements. The product was handed off to a technical group of information technology specialists and trust resource managers. *This task was completed on schedule by April 24, 1998.*

D. Prepare and Publish Request for Information (RFI) for COTS Systems

Working with the servicing procurement office, the joint BIA/OST team and the systems consultant prepared and published a formal RFI for applicable commercial off-the-shelf applications thought to meet the functional requirements defined in preceding tasks. *This task was completed on schedule June 19, 1998.*

E. Organize Joint Technical Team to Develop Functional Requirements and RFI

A technical team elaborated on and refined the high-level requirement definition, evaluated commercial off-the-shelf applications, prepared a preliminary systems design, developed acquisition documentation, and obtained Departmental approval for proceeding with a procurement action.

The team interviewed a number of potential contractors, exchanging information regarding the BIA's specific information needs, logistical requirements for deployment, organizational issues and resource constraints.

Two vendors submitted final bids which were evaluated according to a pre-determined contract ranking system. *This task was completed in September, 1998.*

F. Obtain DOI Approval for the System and Approach

The joint BIA/OST staff prepared and submitted to the Department a Technology Investment Analysis (TIA) to justify the proposed TAAMS system and acquisition approach. *The Department approved the TIA on September 11, 1998.*

G. Develop Procurement Documents Using Joint BIA/OST Technical Team and Systems Consultant

Using the results of internal research, review of existing automated national and local systems within BIA, and feedback from the RFI, the joint BIA/OST team and the system consultant prepared the necessary procurement documents and supplemental justification for the TAAMS system acquisition. *This task was completed August 27, 1998.*

H. Select TAAMS Project Management Team

A BIA project manager was selected and a project team structure and project management approach was developed. Team composition included program experts from BIA and OST and information technology specialists from consulting firms. *This task was completed on schedule November 30, 1998.*

I. Award Contract to Successful Bidder

BIA awarded a contract to the successful bidder based on pre-defined criteria by a source selection board consisting of BIA, OST and Departmental staff. *The BIA*

issued a performance-based contract to the successful offerer on December 2, 1998.

J. Develop System Modification Strategy with Contractor

The BIA project management team worked with the selected TAAMS provider to develop a comprehensive system modification strategy. BIA system users met regularly in pre-defined functional teams with the software vendor in order to further define and outline user needs and requirements. Users participated in the actual design of the graphical user interface. As implemented, TAAMS is best described as a modified off-the-shelf system (MOTS).

Using the legacy data from the Rocky Mountain Region, the teams mapped data needed to populate the selected trust asset management application and developed automated routines for data conversion.

The actual system modification was conducted between January 1999 and May 1999. The TAAMS prototype was unveiled on schedule in June 1999 in the Rocky Mountain Regional Office in Billings.

K. Complete System Modification Effort

The BIA is working with the software vendor to modify the off-the-shelf product through

an iterative process of developing system prototypes. Each prototype is reviewed by the user and further revisions are made until the prototype is accurate and reflects business needs.

The software vendor and the BIA collaborated on a series of test scripts that could be used during system testing. The actual script was developed by a third-party contractor. As the TAAMS software evolved, the script underwent continual change. The scripts can continue to be used for future regression testing of TAAMS.

The initial system modification effort includes all development requirements of TAAMS, including developing the interfaces with TFAS and MMS, mandatory reports, and all contract functional requirements that were determined to be mandatory in the original contract (as amended by contract modifications that were necessary to reflect the dynamic system development that has been undertaken by the Department). As the initiative progressed, it became apparent through direct discussion with the user that certain TAAMS features could be deferred and others would need to be accelerated. Contract modification was necessary to ensure that the required core functionality was properly identified in contract form.

Because TAAMS provides functionality to different BIA realty operations, it is consistent with information technology "best practices" to consider deployment of TAAMS on a functional basis as opposed to waiting for the entire system to be completed. As such, the BIA plans to deploy TAAMS to its title plants while continuing to test and solidify all aspects of

the leasing modules, including the interface between TAAMS, TFAS and MMS.

The Title portion of TAAMS is scheduled for completion May 2000. The mandatory realty functions, including the necessary interfaces with MMS and TFAS to process distribution transactions, are scheduled for completion in August 2000.

L. Analyze the National Requirement for End User Work Stations and Distribute Necessary Hardware to Rocky Mountain Region as needed

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The original HLIP stated that the Department would acquire approximately 2,000 new workstations for TAAMS users (one-half new purchases and one-half upgrades). As the desktop requirements of the TAAMS software solidified, it became obvious that TAAMS, coupled with other new software packages used by the Department such as Lotus Notes, could not effectively be run on the existing equipment.

As such, more new PCs than originally planned for will be required. To date, the replacements have come from the Department's Y2K PC replacement effort. A large number of PCs have been purchased for the BIA and tribes and they will ease the transition to TAAMS. As the software is deployed, across the country, continual re-evaluation of PC needs will be required to ensure that the proper hardware is available.

M. Conduct System Testing

The software vendor will perform unit integration and system testing of the system after it is unveiled at the pilot site in Billings. The BIA will provide a user team to work with the vendor to ensure that the system is operating properly and that it meets the BIA's business needs. The users will use a system test procedure consisting of detailed test scripts which will test all aspects of the system. Final system testing will be conducted by the software vendor. *Testing was conducted the weeks of September 27 and November 22, 1999.*

N. Complete Training of Support and User Personnel at Pilot Site and for remaining BIA and Tribal Personnel

Training on the new Trust Asset and Accounting Management System in Billings is expected to include both BIA and OST users and designated support personnel. The training is provided by the software vendor.

Subsequent TAAMS training will be provided by a team of trainers consisting of the software vendor and BIA program experts and will be conducted in a central training facility.

Training will be conducted based on the functional need of the staff and will vary in length from one day to one full week. Training effectiveness will be evaluated and retraining for staff will be conducted as necessary. New user training will be scheduled during conversion at other sites.

User training is scheduled for completion approximately 7 to 45 days prior to implementation of the new Trust Asset and Accounting Management System at each Region to ensure better user retention of the training information and skills.

Approximately 50 training sessions will be conducted for BIA and tribal staff over the next year and one-half. The provider will be tasked with staffing an extensive help desk operation to aid in the conversion and training effort.

Since the initiation of the training effort, it has become apparent that TAAMS requires a more intensive level of user training than previously estimated. TAAMS differs significantly from the legacy systems it is replacing and users need to acquire a completely different approach to data entry. Furthermore, there are business changes which are occurring along with system implementation that must also be addressed during training. *Training sessions for the Rocky Mountain Region staff were completed in early June 1999. Training for new users was conducted again in September 1999 and repeated in November 1999. Retraining will continue in Billings until a satisfactory level of user familiarity with TAAMS is demonstrated.*

O. Complete Independent Verification and Validation of TAAMS

An Independent Verification and Validation (IV&V) contractor, SRA, International, was hired in May 1999 to provide the Department with an independent review of the TAAMS application. The Department's purpose was to independently assess the TAAMS system for compliance with the contract's functional requirements, provide feedback on the overall usability of the application by BIA end users, and assess the BIA's preparation for deployment.

From June through November 1999, the IV&V team observed various system and functional tests of TAAMS, culminating in the final system test on November 22-24. Based on industry standards and their own testing experiences, the IV&V contractor provided suggestions the TAAMS team was able to incorporate, improving the test results and ensuring the tests were repeatable. From February 1-4, 2000, the IV&V contractor staff also attended the User Test at the Rocky Mountain Regional Office (in Billings, MT) as observers. This provided the IV&V team feedback on the BIA end users' reaction to the TAAMS application and how the system works in the field.

In their report, the IV&V team made the following recommendations. They stated the TAAMS test plan was adequate and the TAAMS team could improve the plan further by adding details on the technical tests (i.e., Performance, Year 2000, and Disaster Recovery test areas). The majority of the test scripts for testing the functional requirements were also adequate and contained enough detail for repeating the test. However, some of the scripts would require additional modification to test the critical functions not totally validated (partially tested, not tested, or failed

validation) by the IV&V team. They recommended the software vendor maintain these scripts for use in regression testing of current changes and any future software releases. Testing of one critical area - the TFAS and MMS interfaces - remained incomplete and the IV&V contractor recommended against full deployment of TAAMS until that functional area was fully tested.

SRA further recommended that comprehensive testing be performed periodically during the deployment phase to ensure full system performance can be maintained under load and the network has sufficient capacity. As a result, periodic load testing will enable the TAAMS project team to detect any performance degradation early enough to provide a timely resolution, if needed.

User feedback indicates the BIA users are eager to begin using TAAMS and the Billings staff are sufficiently trained. SRA also recommended assessing the users' needs prior to deploying to each new area. They also recommended that the Department solidify its business rules concerning trust operations and incorporate them into TAAMS.

The IV&V team concluded their report with the following: "Assuming the foregoing recommendations and risk mitigation strategies are implemented, the IV&V team [SRA] feels that deployment beyond the Rocky Mountain Region could proceed with minimized risk and a reasonable assurance of success."

P. Initiate TAAMS Pilot at BIA's Rocky Mountain Region Office

The TAAMS prototype was unveiled at the BIA's Rocky Mountain Region Office in order to give the public and the BIA staff an opportunity to undergo initial training and exposure to the system. Immediately following the unveiling, an extensive set of testing procedures and user reviews was conducted to insure that TAAMS met the contract requirements and user needs. *Unveiling of TAAMS was completed on June 25, 1999 at the Rocky Mountain Regional Office.*

Q. Perform User Testing at Pilot Site to Determine Adequacy of TAAMS Under "Live" Conditions

The performance of TAAMS at the Rocky Mountain Region pilot test site is being evaluated against pre-established requirements specified in the contract to objectively measure the success of the new TAAMS.

All Billings region agencies are included in the pilot. Both pilot and parallel processing will continue until the user community feels comfortable with TAAMS and a decision is made to discontinue data entry into the legacy systems.

A user test was conducted in the Billings Regional Office the week of February 1 - 4, 2000. Simultaneously, testing was conducted at the Crow Agency and realty staff from four additional agency offices participated in the user test at the Billings site. A significant number of transactions were entered into both TAAMS and the legacy systems in order to ensure that TAAMS was providing accurate results. In addition, a usability questionnaire was administered to the participants.

Transactions for both the leasing and title function were entered into TAAMS, with the heaviest concentration focusing on title. The test did not include a full test of the accounting and distribution capabilities of TAAMS because it had already been decided to focus on title processing. A similar user test will be conducted at a later date which fully addresses the leasing, accounting, distribution and interface functions.

Initial results from the User Test were positive and illustrated a high level of acceptability of TAAMS by BIA users. The transaction analysis indicated no major problems and demonstrated that the core functionality for TAAMS existed in release Version 1.0.

The TAAMS project management team has scheduled a meeting in early March with the BIA, OST and MMS, along with all respective software vendors to discuss any remaining interface issues. It is anticipated that the remaining concerns will be few and can be addressed without any major delay.

R. Deployment Decision Review

The BIA completed its official assessment of the title functions of TAAMS in terms of system functionality and usability in February 2000. That assessment will be forwarded to the Department for a final deployment decision for roll-out to BIA title plants as the first stage in the total TAAMS roll-out. *The initial deployment decision for the LTROs is expected to be made in March 2000. A follow-up decision will be required when distribution and interface capabilities are in place and adequately tested. The time for this is to be decided.*

S. Deployment to BIA and Tribal Sites

Deployment begins with the loading of TAAMS software on the desktops of the individual workstations at the office site. For project management tracking, the "deployment date" reflects the above action. Upon loading of software, an extensive set of data reports will be provided to the office to review the converted data resident in TAAMS. These reports will form the basis for the initial activities conducted under deployment data cleanup.

The realty personnel at the deployment site will be required to carefully review the data reports and, with DataCom Sciences, Inc., make a determination regarding the completeness and quality of the converted data. The determination will include an estimated period of time in which the office will become familiar with TAAMS, initiate any immediate corrections to the database necessary to ensure that processing can be accomplished, adjust local work flows, and ensure that the local network and

telecommunication infrastructure is properly functioning. The TAAMS project management team will also be involved in this determination.

Once the tasks are satisfactorily completed and the office is using the TAAMS software full-time, the site will be considered "implemented". This period may be as short as two-weeks or as long as 120 days depending on the issues that must be addressed at that individual site.

Deployment will be conducted in two phases. First, all Land Title and Records Offices will be deployed. Once TAAMS is fully operational in all LTROs, deployment to BIA and tribal offices conducting the realty function will begin.

Deployment planning for both title and realty functions includes a readiness review at each deployment site including the following criteria:

- Data cleanup status
- Hardware delivery
- Communications availability
- Security requirements fulfilled
- Training conducted
- Management involvement

For the LTROs, deployment will be conducted on an office-by-office basis until all eight offices are complete. The Title deployment will also include three tribal sites that have contracted to perform title functions.

At present, it is estimated that all sites performing the title function will be deployed between May and December, 2000. Realty sites will be deployed beginning in August 2000 at BIA Offices and continuing through

to Tribal sites.

The Realty deployment schedule will generally follow a geographic process, although a specific sequence has not yet been determined. Various options exist including a regional geographic deployment schedule as originally discussed in this Plan or deployment in "groups of offices" irrespective of geography.

As stated above, the actual sequence is based on site readiness, including completion of pre-implementation data cleanup. Once the Department makes a final decision regarding deployment, a more precise schedule will be developed subject to modification based on site readiness.

Because system deployment is dependent on the completion of cleanup activities at each site, it is not possible to *project a complete deployment schedule* at this time. Therefore, the BIA will review data cleanup progress quarterly at each potential deployment site and initiate detailed deployment planning at only those sites that can reasonably be deployed in the following six months.

T. Complete TAAMS Deferred Modifications

The TAAMS contract for software services identified a number of functions for TAAMS which were classified as mandatory-deferred. These functions were determined to be important but not required in TAAMS Version 1.0. Upon a deployment decision by the Department, indicating that TAAMS

Version 1.0 is acceptable, BIA design teams will initiate a thorough development of design specifications for these contract requirements to provide to the software vendor to support the modification of TAAMS to include the following additional functionality.

- Estate Administration
- Miscellaneous Conveyance features
- Miscellaneous recording features
- Lease closeout features

These functions are scheduled to be part of a planned release of TAAMS by September 30, 2000. The Department will evaluate the need and delivery of these requirements in June 2000 in order to ensure that initiating work on these features is still consistent with the design of TAAMS and would not interfere with the on-going system modification effort at that time. If it is necessary to postpone, revise or amend the TAAMS contract in any manner, it will be officially modified after that analysis.

Additionally, there may be other system enhancements, not found in the original TAAMS contract, which will be included in TAAMS Version 2.0. Included may be appraisal, enhanced probate and, possibly, a geographic information system.

U. TAAMS Documentation and Supporting Information

A significant level of corresponding documentation is being developed to support TAAMS, including an expanded data encyclopedia, user entry reference guidance, user manuals, system

architecture, etc.

Documentation is completed as appropriate
to the initiative. This will be reviewed and
incorporated as appropriate in the
Department's Trust Business and Computer
System Architecture Framework.

V. TAAMS Ongoing Operations

The TAAMS initiative includes ongoing
operations through the contractor's service
bureau. As such, the TAAMS contract calls
for a number of performance requirements
through the life of the contract. These
requirements will be regularly reviewed by
the BIA to ensure that the contractor is
meeting all contractual requirements.

Examples of these performance
requirements include:

- System speed and performance
- Disaster recovery services
- System backup
- System configuration management
- Application maintenance services
- Auditing and system monitoring
- Operations security

This task is ongoing, with various reviews
conducted on both a quarterly and annual
schedule by an outside and objective
third-party technical expert. Those elements
will also be reviewed in the Department's
Trust Business and Computer System
Architecture Framework effort.

7. MMS SYSTEMS REENGINEERING

I Responsible Official

The responsible official for this subproject is the Director, Minerals Management Service. The subproject manager is Milton Dial of the MMS Royalty Management Program (RMP).

II Statement of the Problem

Faced with changing energy markets, new legislative mandates, and aging computer systems, RMP made the decision to reengineer its core business processes and support systems. This initiative is necessary in order for the RMP to remain cost-effective and responsive to customer needs and to fulfill its trust responsibility to American Indians.

III Statement of Objectives and Outcomes

In this subproject, the MMS will design and implement new royalty management business processes and automated support systems. The RMP Business Process Reengineering Initiative will address all core business processes and automated support systems, within RMP's financial, accounting and compliance operations. While the reengineering effort encompasses all of the

RMP, for purposes of this implementation plan, this subproject will highlight how our Indian program will be impacted and the benefits that can be expected by Indian Tribal and Allottee mineral owners.

The future RMP will be process centered; focused on outcomes; less costly; and well positioned to meet mission requirements. The future end-to-end process designs, organizational structures, and modernized automated information systems, once finalized and implemented will enable the future RMP to deliver the very best royalty management services at the lowest possible costs. The uniqueness of Indian mineral leases has played a significant role in conceptualizing the future RMP processes and support systems throughout the initiative. Indian Tribal and allotted mineral owners will benefit in significant ways from the reengineered RMP.

Improvements under consideration include:

- Reducing RMP's current business cycle from 6 to 3 years, consistent with expected industry standards;

- Aligning RMP's operations into two core end-to-end business processes; the Financial Management Process and the Compliance and Asset Management Process;

- Establishing organizational accountability for compliance and asset management outcomes at the producing property level (mineral leases would be brought in compliance and kept in compliance);

- Simplifying current regulatory reporting requirements to reduce reporting burden for

both RMP and industry (royalty reporting is expected to be reduced up to 40 percent);

- Modernizing RMP's automated information systems.

Expected benefits for Indian mineral owners include:

- Accelerated availability of money to Indian recipients;

- Dramatic reduction in RMP business cycle from 6 to 3 years which will ensure more rapid identification and efficient collection of royalty underpayments.

- Improved focus and effectiveness of compliance activities on Indian lands by changing to a property and producing area approach. This will permit the acquisition of detailed knowledge of production-area-specific factors that impact Indian royalty calculations such as majority price determinations and dual accounting for processed gas sales;

- More detailed information will be collected regarding Indian oil and gas production dispositions. This will be accomplished by converting from the MMS Form 3160 to the MMS Form 4054, Oil and Gas Operations Report. Additional information collected through this change will better support verification work to assure that royalties have been paid on all lease production volumes.

- Modernized automated systems and data structures that can be configured for use at multiple sites with varying operational size and complexity. This capability will -

    - facilitate delegation, compacting, and contracting by Tribes, and

- provide substantially improved data access, analytical capability and assurance of continued systems reliability;

- There may also be potential for additional detail over current royalty reporting if we are able to accommodate well-level financial reporting versus the current lease-agreement level reporting. Several Indian Tribes have identified circumstances where well level sales valuation and payout status determination is necessary to correctly calculate and validate production royalty payments. However, we are still looking carefully at the associated costs and benefits.

IV Relationship to the Reform Act of 1994

The Reform Act Section 303(b) (4) directs the Special Trustee to insure that MMS maintains effective policies and procedures to enforce Indian land lessee compliance with timely and accurate lease production reporting and revenue payment requirements. The MMS reengineering effort and associated performance measures are designed to improve reporting timeliness and accuracy.

V Relationship to other Subprojects

Information that is generated by the MMS Royalty Management Program will be utilized by TFAS for Individual Indian and Tribal accounts and accounting. The MMS effort will be affected by Records Management, Policy and Procedure and Internal Control subproject reforms and

actions.

VI. Estimated Subproject Budget

The estimated subproject budget for this effort is depicted in the table below.

SUBPROJECT BUDGET MMS System Reengineering				
Fiscal Year	FY 1997/ 1998	FY 1999	FY 2000	FY 2001
$$ in millions	--	1.0	3.0	3.0

The July 1998 High Level Implementation Plan anticipated a one-time funding request by the Department and the President of $4.7 million for FY 2000, to support systems installations to occur during FY 2000 and FY 2001. The President's FY 2000 budget request forwarded to the Congress included funding of 3.0 million for FY 2000. The remainder of the needed funding is expected in the FY 2001 budget request. Total estimated funding has been adjusted based on the award of the financial systems contract.

VII Subproject Action Plan

A. Initiate Program-Wide Reengineering with Full-Time Design Team

In April 1996, the RMP undertook a reengineering initiative to address its compliance processes and strategies and determine the best approach for accomplishing future goals and objectives. A decision was made April 1, 1997, to go beyond compliance reengineering and address all of the core business processes of the RMP. A Project Office was established and a multi-disciplinary design team was assembled and trained for this task. *This task was completed on schedule on April 30, 1997.*

B. Identify Processes for Business Process Review

The reengineering team examined the current RMP business environment and focused its efforts on all core business processes within mission critical operations. Administrative support processes are excluded. The team identified two core business processes that the RMP will operate to accomplish its mission objectives in the future: Financial Management and Compliance and Asset Management. *The identification of processes for business process review was completed May 31, 1997.*

C. Benchmark the Processes

The reengineering team conducted extensive benchmark surveys of other public and private enterprises within and outside the United States to identify the "best practices" for consideration in the design of future RMP processes. More than 30 organizations were included in the benchmarking effort. This task was largely

completed in December 1997, but represents a continuing activity as additional areas of opportunity for process improvement are brought to light. *This task is ongoing.*

D. Map Processes

The reengineering design team examined the current RMP business environment with an intensive mapping of its "as-is" process. This was augmented by Performance Engineering Corporation's (PEC) in-depth assessment of the automation infrastructure supporting the existing business processes. *The design team completed mapping the processes on July 11, 1997.*

E. Obtain Customer / Constituency Input

As part of this effort, the following organizations are consulted on an ongoing basis:

- State and Tribal Royalty Audit Committee
- Royalty Policy Committee
- Council of Petroleum Accounting Societies
- BLM
- BIA
- MMS Offshore Minerals Management

Partnerships have been formed with leading oil and gas and solid mineral companies to jointly explore ways to exchange information and advance new reporting and operational procedures.

Customer and constituency input has been

gained across a broad front during the Initiative. MMS will continue its aggressive communications strategy to gain further input as the Initiative progresses to completion and thereafter.

F. Complete Preliminary Design Document and Gain Decision to Proceed

Development of the preliminary design concepts was guided by design parameters and performance goals defined by RMP senior managers. Specifically, future systems processes were to be capable of:

- Supporting the collection of royalties both in-cash and in-kind.

- Supporting delegated activities related to royalty administration.

- Permitting the use of a variety of methodologies to value production.

- Permitting RMP to provide related financial services for other customers through franchising arrangements.

Performance goals determined were:

- Assuring compliance with applicable laws, lease terms and regulations for all leases in the shortest possible time, but no later than 3 years from the due date.

- Providing revenue recipients with access to their money within 24 hours of the due date.

The design team was also guided by the following parameters in development of

work:

- Current laws continue to apply.

- RMP regulations can be changed.

- New work processes should cost less than the current equivalent mission costs.

With the completion of the preliminary design concepts, the design team identified key issues in three areas that needed to be addressed to achieve the performance stretch goals and parameters envisioned: organization and business processes, automation infrastructure and information needs. *MMS issued the Preliminary Design Concepts Report of the RMP Reengineering Team in March 1998.*

G. Complete Prototyping and Pilot Testing

Based on the findings and recommendations presented in the Preliminary Design Concepts Report, the design team continues to analyze and test many of the concepts and technologies through prototyping and piloting. With the pilot and prototype work completed, the RMP initiated the operational model phase in which future compliance processes are being applied in a "live" environment with operational responsibility for subsets of the lease universe being transferred from the existing RMP organization to the model teams.

The RMP currently has four operational models in place: Onshore Oil and Gas, Offshore Oil and Gas, Jicarilla Apache, and Solid Minerals. The Onshore Model Team includes representatives from the Ute Tribe, the States of Colorado and Utah, and the MMS. The Solid Minerals Model Team includes representatives from the Navajo Tribe, the Crow Tribe, the States of Colorado, Utah, Wyoming and Montana, and MMS. The Jicarilla Model Team includes representatives from the Jicarilla Tribe and MMS. The Offshore Model Team includes representatives from MMS. *Piloting and prototyping was completed in August 1998. The operational model phase commenced in November 1998 and will continue and expand through FY 2001 implementation.*

H. Complete Project Capital Investment Plan and Independent Verification and Validation

The MMS RMP Capital Asset Plan and Justification (Plan) were prepared in conformance with Office of Management and Budget Circular A-11, Part 3, 300b guidelines for planning, budgeting, and acquisition of capital assets. Productive Data Solutions, Inc. (PDS) performed an independent validation and verification study of the RMP reengineering project. PDS reaffirmed the premise that the planned reengineering of the RMP support systems can be brought effectively to completion in the forecasted time and given the specified budget. The conclusions of PDS were predicated on RMP's close adherence to defined process management, to the close monitoring of project execution, and awareness of various

issues outlined in the PDS report.
This task was completed in September 1998.

are conducted on a monthly basis. *The Road Map to the 21st Century was completed in November 1998.*

I. Implementation Plans Issued

The implementation plan, Road Map to the 21st Century, has been prepared to place the reengineering concepts and recommendations on the implementation path and guide RMP through the necessary organizational transformation. The Road Map sets forth more than 50 major action elements that must be successfully planned, staffed, and executed over a 3-year period to achieve the desired RMP performance goals.

The Road Map to the 21st Century is premised on extensive employee, customer, and stakeholder involvement, partnerships with clientele, and proactive outreach and communications with all who are engaged in the implementation process. The Road Map's action elements will also bring forth state-of-the-art information technologies and solutions designed to more fully utilize the talents of the RMP workforce, broaden individual job responsibilities, and position the future RMP as the best in class of service.

To effectively manage the action elements set forth in the Road Map, RMP developed the RMP Reengineering Project Plan to track 14 subprojects and all of the associated tasks and dependencies. Progress is monitored continuously by RMP senior management and progress reviews

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J. Implement Process Leading to Award of Financial System Contract and Complete Development and Installation

RMP has implemented a contracting strategy that features a two-phased contract award process. The first of the two RMP modules to be contracted will be the financial module that includes a COTS-based financial and accounting system, a relational database management system and an incremental "spiral" development plan for subsequent applications. In preparation for requesting proposals for the financial module, RMP invited industry to submit capability statements. Evaluation of these submissions identified proposals with the highest probability to succeed.

Requests for Proposals were received from four vendors on June 2, 1999. An RMP Technical Performance Evaluation Committee (TPEC) completed evaluation of the proposals on July 9, 1999. In addition to the TPEC, RMP hired an independent company to assist in the independent functional validation of the commercial-off-the-shelf components of the proposals. *Technical evaluations were completed on July 23, 1999 and the Financial System development contract was awarded on September 23, 1999.*

K. Financial System Development Consistent with Deliverables Schedule and Transition and Training Strategies

The contract for the development of the Financial System will be monitored for consistency with the contract deliverables schedule and transition and training strategies.

The Financial System development mobilization began October 1999 under a 120 day activity plan. During this phase the contractor completed tasks necessary to establish the technical resource base for design and development, further define functional requirements, prepare for COTS fits analysis, and complete the overall project plan for the duration of the development effort.

The Financial Contract Management Plan and schedule for development deliverables was completed January 31, 2000. This plan comprehensively addresses the development and implementation effort which will include an independent validation of the MMS interfaces with TAAMS/TFAS. Important milestones within the plan include

- Completion of the COTS fit analysis;

- Completion of the general and detailed application design;

- Building and testing the application

components;

- Designing, building and testing data conversion; and

- Planning and executing the functional and performance acceptance test.

L. Complete Development and Delivery of Financial System, Relational Data Base Management System and Related Modules

The COTS-based financial system, relational data base management system and related modules are expected to be completed and delivered for operation September 30, 2001.

M. Award Compliance System Contract and Complete Development and Installation

Concurrently with the development and award of the Financial System contract, work will proceed on the compliance module. Requirements are being further defined by the Operational Models. Staff from RMP and the current on-site contractor, PEC, have teamed in a separate effort to support the Operational Models' testing and process refinement activities. By the end of FY 2000, the compliance module will be ready for development.

MMS is continuing to evolve its contracting

strategy regarding the compliance system. As the financial system is developed, it may provide useful tools and a foundation for the compliance arena, possibly precluding the need for a separate contract. We will make that decision as the financial system is developed. *The development and implementation plan for the compliance system is expected to be available within 120 days of contract award.*

N. Complete Development and Delivery of Compliance System

The development of the compliance system will be monitored for consistency with the contract deliverables schedule as well as MMS organizational transition and training strategies. *The compliance system is expected to be completed and delivered September 30, 2001.*

8. RECORDS MANAGEMENT

I Responsible Official

The responsible official for this subproject is the Special Trustee for American Indians. Ken Rossman, Director, Office of Trust Litigation Support and Records (OTSLR), OST, is the subproject manager.

II Statement of the Problem.

The inadequacies of Indian trust records have been well documented in Congressional reports, legal documents and testimony, the Special Trustee's Strategic Plan, various audits and oversight reports, including those of the National Archives and Records Administration (NARA), and in the media. Among the primary obstacles to improving the Indian trust management program and complying with the *American Indian Trust Management Reform Act of 1994* are the poor records and record keeping systems of the Bureau of Indian Affairs. The decentralization of the Bureau and varying conditions at its offices have resulted in a complex record keeping environment, even as reliance on its records has increased. Attempts in the early 1990s to correct these problems were insufficient, inconsistent, and cut short by reductions in resources. Since Secretarial Order 3197 transferred the financial trust services function from BIA

to the OST in February 1996, some of the deficiencies apply to OST as well.

III Statement of Objectives and Outcomes.

The objective of the Records Management subproject is to implement a unified records management solution for Interior trust records involving OST, BIA, MMS, BLM, OHA and other participating DOI Offices. This includes a number of specified actions and reforms covering the full range of records issues including program management, records retention and storage, training, and electronic records.

In its 1990 report, NARA cited the following major deficiencies in the Bureau of Indian Affairs records management program; all are addressed in this subproject:

- Inadequate response to serious problems identified by previous NARA evaluations;

- Continued mistreatment of permanent records maintained by Land Title and Records Offices;

- Insufficient records management staff at the headquarters level and an inconsistent assignment of records management staff and their associated duties throughout headquarters and field operations;

- Lack of a cohesive network of professionals to administer the records management program;

- Inadequate management involvement in implementing the Bureau's (and the Department's) regulations relating to records management;

- Failure to carry out the provisions of the Indian Self Determination Act (PL 93-638) by not providing systems and resources for tribal organizations to properly manage Federal records;

- Inadequate records management training;

- Inconsistent application of filing methods and approved disposition instructions;

- Lack of a program of internal records management evaluations;

- Poor communications among records management staff members, records custodians and program offices;

- Large volumes of inactive records (many of which are permanently valuable or are potentially permanent) maintained in agency space, some under adverse environmental conditions.

The initial planning assumptions, subject to continuous review by the Department and the National Archives and Records Administration (NARA), include:

- Shared budgetary resources directed to a single, joint records operations solution, which will likely include shared staff and facilities;

- Cost effective, workable solutions to temporary records handling, storage, and retrieval, which relies on the use of contractor assistance and NARA as fully as possible;

- Cost efficient temporary physical storage facilities pending accession to NARA, Federal Records Centers, and Archives;

- Appropriate preservation and safeguarding of records from loss, damage, destruction

and unauthorized access;

- Provision of training, guidance, and oversight of records in the Office of Trust Funds (OST) and the Bureau of Indian Affairs (BIA) trust operations under a joint operations concept.

The management of the subproject is centered principally in Albuquerque, New Mexico and in Washington, D.C., but extends to the various Bureaus and Offices of the Department engaged in any aspect of the management of Indian assets held in trust.

An Indian Affairs Records Management Steering Committee consisting of the Assistant Secretary - Policy, Management and Budget; the Assistant Secretary – Indian Affairs; and the Special Trustee for American Indians has been established to oversee the Indian Affairs Records Management program.

IV Relationship to Reform Act of 1994

The Records Management subproject is essential to providing accurate and reliable information to account holders. This effort specifically addresses the following requirements of the Reform Act:

- Providing adequate systems for accounting for and reporting trust fund balances;

- Providing adequate controls over receipts and disbursements;

- Providing periodic, timely reconciliations to assure the accuracy of accounts;

- Determining accurate cash balances;

- Preparing and supplying account holders with periodic statements of their account performance and with balances of their account which shall be available on a daily basis;

- Establishing consistent, written policies and procedures for trust fund management and accounting;

- Providing adequate staffing, supervision, and training for trust fund management and accounting;

- Appropriately managing the natural resources located within the boundaries of Indian reservations and trust-lands;

- Properly accounting for and investing, as well as maximizing, in a manner consistent with the statutory restrictions imposed on the Secretary's investment options, the return on the investment of all trust fund monies;

- Preparing accurate and timely reports to account holders (and others, as required) on a periodic basis regarding all collections, disbursements, investments, and return on investments related to their trust accounts;

- Maintaining complete, accurate and timely data regarding the ownership and lease of Indian lands.

V   Relationship to Other HLIP Projects.

The Records Management subproject supports the OST and BIA Data Cleanup projects, the TFAS, TAAMS and MMS Reengineering projects, the Probate subproject, and the Training, Policies and Procedures and Internal Control subprojects.

VI Subproject Budget.

The estimated subproject budget for this effort follows:

SUBPROJECT BUDGET Records Management				
Fiscal Year	FY 1997/ 1998	FY 1999	FY 2000	FY 2001
$$ in millions	.8	1.5	9.6	8.0

VII   Subproject Action Plan

The particular tasks and milestones necessary to successfully complete this subproject are outlined in the following items.

A.   Establish OST/BIA Working Group to Coordinate Joint Records Solution

This task was completed on February 11, 1998, through a joint BIA/OST memorandum appointing the Records Management Working Group. This document directed the Working Group to formulate and present to OST, BIA management, and the Department's CIO plans and budgets for accomplishing the tasks and actions necessary to meet this subproject's goals and objectives.

B. Transfer Responsibility for Trust Financial Records from BIA to OST

This task comprises the initial work undertaken by the BIA/OST Working Group, and was *completed on March 5, 1998.* The chosen method of transfer was a series of three memoranda and letters addressed from BIA to the Special Trustee, NARA, and the Indian Trust Accounting Division, parties presently in possession and control of financial trust records. These parties were advised that the records were to be transferred to the legal custody of the OST. The BIA authorized OST to transfer and access all financial trust-related records identified in the 16 BIAM, BIA Record Schedule, Appendix 1, series 4800 and 4850 (Trust Funds and IIM).

C. Develop Joint Procedures for Records Access

Joint procedures for access to trust-related records are spelled out in the BIA/OST Memorandum of Understanding developed between OST and BIA that was completed on June 9, 1998. In May 1999 OST and BIA programs were consolidated under the authority of the Director, OTLSR.

D. Develop Agreement between OST and BIA on Records Operations

OST and BIA completed a Records Management Memorandum of Understanding on June 9, 1998. The MOU established requirements to maintain Indian records based on the trust responsibility and fiduciary trust concepts. These requirements, to include separate BIA and OST records schedules that accurately define trust-related records, were established so that trust records are preserved for the appropriate periods to ensure fiduciary trust accountability to Tribes and individual Indians. The MOU also provided for the transfer of financial trust records from BIA to OST, identified all trust-related records, based on 16 BIAM; and detailed the joint goals and objectives of the program.

E. Prepare Plan for Records Imaging Technology; Obtain Approval

OST prepared a plan and received approval for a records imaging program on June 30, 1998. This program was based on sound electronic records practices and complies with NARA and DOI policies and standards for the creation, maintenance, and disposition of electronic records.

F. Commence Records Imaging Efforts

Imaging began in June 1998 pursuant to an agreement entered into with Native American Systems (subsequently through an independent agreement with the subcontractor Lason) as a pilot project to scan and image IIM jacket folder documents. *More than two million documents were imaged through September 30, 1999.* Following the lessons learned in this largely successful pilot, the effort has been expanded in scope. The indexing scheme, retrieval capabilities, and overall efficiency of the system are being improved and efforts are underway to obtain contractual services to image selected OST trust financial documents.

G. Initiate Development of Respective Records Control Schedules

OST and BIA developed separate Records Control Schedules, Freedom of Information Act operations, and Privacy Act Systems of Records. Coordinators for the latter two of these functions are designated at Region/Agency/Office locations responsible for daily operations. Records liaisons are designated for program offices at all locations where OST and BIA records are created, maintained, and disposed. *Initial draft records schedules were developed*

and submitted to OST and BIA management, and the CIO, in September 1998. They are under further development by the Director, OTSLR (see Section DD.)

H. Develop an Agreed-Upon Approach to Indian Trust Records Management

The Assistant Secretary – Policy, Management and Budget, approved an action memorandum for an agreed upon approach to trust records management on *May 19, 1999,* as recommended by the Assistant Secretary – Indian Affairs, and the Acting Special Trustee for American Indians. This implementation plan was based on an evaluation and report prepared by an experienced, independent Federal records manager during the period October 13, 1998 - January 4, 1999. The report made 21 recommendations, each of which was approved, some with modifications, in the May 19 action plan. The recommendations are incorporated into this subproject.

I. Eliminate Existing Disposition Backlog at BIA Locations

A three-year project to cleanup the backlog of records stored at BIA and OST locations was initiated in May 1999. As a first step, in May-June 1999, a preliminary survey was taken to determine sites with particular records storage problems or where records

were particularly at risk. This information was supplemented by site visit reports from the Special Master in Cobell v. Babbitt in April and again in November 1999. The IARM staff conducted a survey from November 1999 through February 2000, to acquire additional first hand reports. Records management specialists were sent to some sites to implement cleanup because of these findings. The Bureau of Indian Affairs also required a detailed report on records storage conditions from each superintendent and each regional director in December 1999, (see Section Q) and records management specialists participated in this information gathering in three regions. All of this information is being used to establish priorities for the long-range cleanup. It has also been used to take immediate remedial action, for example, at Zuni, Anadarko, and Fort Totten. This task calls for records management specialists to visit every office to identify needs and implement the steps to complete an inventory of all records at hand and to recommend and implement specific actions needed to safeguard their preservation or to carry out properly authorized disposition. *Completion is expected by May 2002.*

J. Complete Systematic Centralization of OST Financial Trust Records

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This project was initiated in 1996. It involves the on-site retrieval of OST financial trust records from OST offices and BIA areas and agencies. Combined with the IIM administrative jacket folders brought to Albuquerque by the Office of Trust Funds Management in 1997 - 1999, more than 19,000 boxes of IIM trust records (47.5 million pages) are now in proper storage and inventoried in Albuquerque. *The systematic centralization of trust financial records was completed on October 8, 1999,* with the exception of 4 agencies referenced below. Additional trust financial documents may be located as a result of other activities including this subproject (for example, the inventory and cleanup tasks). In addition, on-going documentation (i.e., new trust financial records) will be periodically transferred from the field to the OST records facilities.

K. Hire Records Management Specialists

An integral part of the reform effort is to develop a cohesive corps of trained records management professionals to serve both BIA and OST. The Indian Affairs Records Management program has selected 12 new records specialists to serve as the core team members of this project. The vacancy announcement for these positions was posted in June 1999. *The last of the 12 new record specialists was hired and reported for duty in January 2000.*

L.   Develop and Issue BIA/OST Records Manuals, Training Aids and Provide Technical Assistance

The task, which was initiated in June 1999, calls for technical assistance and consultation to assist record keepers and their managers. These services would be delivered on-site, by telephone, by email, on the Internet, and through a series of publications - including manuals, training aids, quick guides, and other information. To date, records management personnel have visited more than 30 offices in the Rocky Mountain, Anadarko, Western, Eastern Oklahoma, Navajo, Northwest, and Southwest Regions and provided on-site training and technical assistance. Tribes, such as Umatilla, which have visited OST facilities, have received technical assistance and training on records issues such as imaging, storage, and records maintenance. *All regions, agencies, and offices are expected to be provided on-site technical assistance by December 2001.*

M.   Train Records Staff and Trust-Related Program Personnel

Formal training with the assistance of the National Archives and Records Administration began in January 2000. Training for personnel with specified records management responsibilities in OST and at BIA regional and agency offices is scheduled to be provided by April 30, 2000. Additional records training is expected to be initiated and will include all BIA and OST personnel, by December 2001.

N.   Lift BIA Moratorium on Retiring Records to the Federal Records Centers

In 1996, apparently as the result of uncertainty over the validity of certain trust records retention schedules, the Bureau of Indian Affairs imposed a moratorium on the transfer of all records to Federal Records Centers (FRC). The moratorium has compounded the records storage problems of the Bureau. It has prevented the agency from transferring records no longer needed in agency space to secure FRC storage, where records are not only properly maintained but inventories are kept for better access. The concern about the destruction of records while in NARA custody was eliminated by working with NARA to freeze the destruction of all BIA records pending revised records schedules. This was done on June 16, 1999, by letter to the National Archives and Records Administration. Further, on October 1, 1999, NARA changed its own procedures to require positive agency action before the destroying any records in its custody. NARA began accepting records late in 1999. Following the hiring and training of a records management staff to properly administer the process, BIA and OST will be formally notified of the complete lifting of

the moratorium *in March 2000.*

O. Resolve Jacket Folder Retention / Production Issues with Tribes

Three Tribes have registered objections to removal of the active IIM jacket folders to Albuquerque for cleanup by DataCom Sciences, Inc., and storage in OST records centers. Tribal leadership cite previous problems when valuable files were removed from the Agency. The three Tribes are the Pine Ridge Agency 9Oglala Sioux Tribe), Standing Rock Agency (Standing Rock Sioux Tribe), and Umatilla Agency (Confederated Tribes of the Umatilla Indian Reservation). A fourth Tribe, Red Lake (Red lake Band of Chippewa Indians of Minnesota), retains trust financial records but not IIM jacket folders. Attempts to date to reach a suitable, mutually agreeable solution that meets the operational needs of both the Tribes and the Department have not been successful. *Discussions have taken place, but as yet, no resolution has occurred.*

P. Analyze Records Storage Requirements.

The systematic centralization and cleanup of OST financial records in the field is completed but for the four aforementioned Tribes. A limited number of additional records are likely to be found during

subsequent visits and searches attendant to activities involving other subprojects. These records are being sent to the OST records centers in Albuquerque when found, as is new documentation on an on-going basis. For BIA records, centralization is not contemplated, but NARA and commercial records center storage will be utilized. The records management program will also recommend and implement, where possible, improvements in local facilities for the storage of current operating records. *This project was initiated in November 1999 and is expected to be completed by December 31, 2001.*

Q. Survey of Trust Records Retention and Safeguarding

In a memorandum to the BIA Agency Superintendents dated November 18, 1999, the AS-IA required the BIA Agency Superintendents to provide a detailed written report to their respective Regional Director outlining the steps that had been taken to safeguard trust records. The Superintendents were to provide their written assurance that they would continue to take appropriate action to preserve and safeguard trust records. The Regional Directors were required to provide a similar written certification to the Deputy Commissioner. IARM staff worked directly with three BIA regions in completing this task. Taken together with the telephone survey (see Section I), these reports are helping establish IARM priorities. They also increased the awareness of the importance of correcting records storage deficiencies

among managers and staff nationwide well beyond that previously achieved. *These reports were completed by December 31, 1999.*

R. Establish Advisory Committee on Records

The long-term neglect of Indian Affairs records suggests the need for continuing external oversight. Accordingly, a high level committee of interested parties will be established to review, advise and make recommendations on Indian Affairs records. Pending final approval of the proposal by the Records Management Steering Committee in May 2000, a charter will be drafted and prospective members identified according to standard Department procedures. *The membership of the committee will be selected by August 2000.*

S. Establish Life Cycle Database (Inventory) for Trust and Other Records

The systematic inventory of tens, if not hundreds, of thousands of boxes and cabinets containing records is the only means by which the safeguarding of trust and all other records can be reasonably assured. Until all records are identified and categorized, the potential for misplaced or inappropriately stored trust records continues to exist. The IARM plans to have

a contractor develop a single, comprehensive nationwide records inventory to include both active and inactive (retired) records. This inventory will be used for various records management controls including research and monitoring of records retirement. Data to complete the inventory will be supplied by BIA and OST personnel, IARM staff, NARA employees as part of their Targeted Assistance program, and contractors. Much data for the inventory already exists; i.e., the OST records centers and the NARA 01 report. *The inventory data base package will be selected by May 2000. The data is expected to be completed by December 2001.*

T. Establish Evaluation Teams and Begin Cyclic Evaluations of Records Programs

One of the recommendations of the National Archives and Records Administration in its 1990 evaluation and report was that BIA establish cyclic reviews of the records management program. As a result, the IARM program will establish cyclic reviews of records management programs at all levels. *The reviews are scheduled to commence by April 2000 and continue thereafter on a recurring, systematic basis.*

U. Initiate Training and Technical Assistance for Compacted and Contracted Trust Records

Tribes conducting federal trust programs and managing the resulting records need to receive the same records management training as government employees. This training will be concurrent with staff on-site visits to BIA agencies and OST/OTFM field offices for records cleanup, training, and review. Whenever possible, staff will visit tribal offices to review any Public Law 93-638 contract/compact records. Information will be provided to the tribes regarding the life cycle of records including storage information, e.g., environmental standards and names of available local commercial storage vendors or NARA Federal records centers. *This work began in December 1999, and will be ongoing.*

V. Initiate Study of BIA Records Imaging Requirements

A study of BIA records imaging requirements will establish which records should be imaged, and for what purpose, and determine whether this project will be centralized, or performed on site. Potential contractors, i.e., Tribes and commercial vendors, will also be identified. Departmental approval for the project will be obtained upon completion of the

Technology Investment Analysis. *The study is expected to begin not later than December 2000.*

W. Initiate Action to Replace Historical Records with Working Copies

Historically valuable, one-of-a-kind documents are being used in the course of everyday business, for example, in LTRO's. The reliance on these documents, some of them more than a century old, should cease, as further use weakens their condition and jeopardizes their value, both as part of the nation's documentary heritage and as records needed for current business. The IARM program will recommend steps to replace these with suitable working copies; e.g., imaging, Geographic Information Systems (GIS), or electrostatic copying. *This task is expected to begin, as a specific part of the records cleanup, by May 2000 and is expected to be completed by May 2002.*

X. Review Trust Records Policies and Procedures with MMS, BLM and OHA and Establish Continuing Dialogue

The IARM program will work with other DOI

bureaus that manage Indian trust records. The purpose is to standardize procedures for managing Indian trust records throughout the Department. Ongoing communication with these organizations will occur through telephone interviews, on-site visits, and reviews of published documents on the DOI website. *This effort is expected to begin by February 29, 2000.*

Y. Award New Contract for OST Imaging

Electronic imaging is one of many solutions to Indian trust records management and retrieval deficiencies. OST has an approved imaging project for an estimated 18 million trust financial documents (see Sections E and F). The RFP is currently being completed for final review and approval. *Pending CIO approval, the projected date of award is scheduled for July 1, 2000.*

Z. Publish Proposed Regulations for Contracted and Compacted Trust Records

A Federal record is any document that "preserves...the organization, functions, policies, decisions, procedures and essential transactions of the agency to...protect the legal and financial rights of the government and (the public)" (44 U.S.C. 3101). The status of Public Law 93-638 records need clarification, i.e., records of tribal contractors and compacted programs are not considered Federal records, yet the Secretary retains fiduciary trust responsibility. The issue of ownership as well as standardized protection of 638 records must be resolved.

By December 31, 2000, the Department is expected to resolve any discrepancy regarding the status of the records and, to the extent permitted by statute, draft proposed regulations for managing records produced under a P.L. 93-638 contract and self-governance compacts. This will be coordinated with the Policies and Procedures subproject.

AA. Complete Plan to Comply with Electronic Records Requirements

IARM is responsible for ensuring that BIA and OST comply with all Federal electronic records requirements. This includes scheduling the disposition of electronic records with major database systems, as well as electronic source documents and Email. This work will involve on-site visits at selected OST and BIA locations. *This project to assure compliance is scheduled to begin in March 2000, and is scheduled for completion within one year. This will be a continuing requirement thereafter.*

BB. Complete Vital Records Plan

Records are a vital resource. Unlike other resources, many records are unique, and once lost or destroyed, they often cannot be recovered. The Department needs to plan for potentially hazardous impacts to records, including electronic records, and must establish and maintain a vital records program as outlined in the *Vital Records and Records Disaster Mitigation and Recovery, An Instructional Guide,* National Archives and Records Administration, 1996. *A plan for complying with these NARA standards is scheduled for completion by April 2001.*

CC. Publish Trust Records Instructional Guide in Conjunction with MMS, BLM and OHA

This publication is intended to provide the history of trust record keeping and describe each bureau's trust records. It will establish standardized trust record policies and procedures within the Department of the Interior.   It will be a user-friendly document that can be used as a desk guide by all levels of the organization. After visits to various levels of these organizations, this document will be developed by the IARM staff, and disseminated to required organizations. *This project is expected to-*

be completed by December 31, 2000. It will be coordinated with the Policies and Procedures subproject.

DD. Complete Submission of Records Control Schedules to NARA

The IARM program will submit various OST and BIA records schedules to NARA in segments as soon as completed and internally approved. For the reform effort, this means chapter by chapter (for example, Finance, Facilities Management, Forestry, etc.). While the approach is incremental, the coverage is comprehensive. *All trust related records schedules are expected to be submitted to NARA by June 30, 2001.*

EE.   Establish Pilot Project(s) for Electronic Record Keeping

To be most effective, a records management program should deal with past, present and also future records. The program should be structured to insure that modern information technology incorporates essential record keeping requirements and facilitates long-term and external uses of the records.   As part of the trust records reform effort, this subproject task will seek to realize, through pilot projects, innovative approaches to electronic document management or electronic document interchange. One example would be a test

of a selected COTS product meeting government standards (DOD 5015.2) for the electronic management of email documents   Another is the use of an electronic work ticket to facilitate data entry into TFAS and indexing related document images. *One or more of these projects is expected to begin in December 2000, with one or more additional pilot projects scheduled to start by December 2001.*

FF. Complete Analysis of BIA Records Imaging Requirements

The analysis of which documents are appropriate for imaging will be finalized as the information is gathered during other tasks of this subproject (see Section V). Recommendations, cost benefit analysis, and Technology Investment Analysis will be the concluding deliverables. More than one imaging project may be considered. *The first of these studies is expected to be done by December, 2000.*

GG. Complete Analysis of Records Storage Requirements

The analysis of present and future records storage requirements for the BIA (See Item Q) will follow from the completion of the records inventory (Section S) and the near completion of the project to cleanup the existing disposition backlog (Section I). A study of the appropriate long-term storage for OST financial records will also be completed. *This project will be completed by December 31, 2001.*

HH. Complete Project to Clean Up Existing Disposition Backlog at BIA

The BIA cleanup project began in May of 1999. *It is expected to be completed by May 2002.*

9. POLICIES AND PROCEDURES

I Responsible Official.

The responsible official is the Deputy Commissioner for Indian Affairs. Arthur Gary, Project Director, in the Office of the Assistant Secretary - Indian Affairs is responsible for coordinating this subproject.

II Statement of the Problem.

Proper management of Indian trust assets has been hampered by a lack of comprehensive, consistent, up-to-date regulations, policies, and procedures covering the entire trust cycle, from management of trust assets to distribution of trust income. Additionally, contemporary federal environmental protection statutes have placed agencies with little direct previous experience in managing Indian trust resources in the position of significantly affecting the use and disposition of Indian trust resources. This has resulted in program gaps and divergent practices, and a corresponding inability to ensure that consistent, sound policies and procedures are applied across the Department in its fulfillment of its trust responsibility. Moreover, there is a need for a comprehensive review of statutory and regulatory authorities and internal program guidance (such as procedural manuals or interagency agreements) to determine the need for revisions and/or the generation of new guidance.

III Statement of Objectives and Outcomes.

- Trust principles for Departmental management of Indian natural resources and trust funds will be developed and issued.

- Current regulatory provisions for Indian trust programs will be reviewed and revised as necessary to ensure the fulfillment of the Secretary's trust responsibility.

- Legislation will be proposed to modernize and clarify ambiguous and outdated statutes governing trust programs, to enact new provisions where statutory guidance is essential, to harmonize inconsistent provisions, and to repeal outdated or unnecessary provisions.

- Internal program guidance related to the management of trust programs within and among all affected Departmental bureaus and offices will be reviewed and revised as necessary.

IV Relationship to 1994 Reform Act.

The Reform Act requires that the policies, procedures, practices, and systems of the Bureau of Indian Affairs, the Bureau of Land Management, and the Minerals Management Service that are related to the discharge of the Secretary's trust responsibilities are coordinated, consistent, and integrated. The Act further requires

"comprehensive and coordinated written policies and procedures for each phase of the trust management business cycle." This subproject is being undertaken to meet these statutory requirements.

The Secretary also performs trustee functions through other bureaus and offices. Thus, this subproject requires the coordination of key policy officials from the Bureau of Indian Affairs, Office of the Special Trustee, Office of Hearings and Appeals, Minerals Management Service, Office of Surface Mining; Bureau of Land Management, Bureau of Reclamation, U.S. Fish and Wildlife Service, National Park Service and the U.S. Geological Survey.

V Relationship to other Subprojects

The Policies and Procedures subproject works with most of the other HLIP subprojects to coordinate the development or revision of regulations, statutes, and internal guidance. The subproject will work with the Probate Backlog, Appraisal Backlog, Trust Funds Accounting Systems, Trust Asset and Accounting Management System, Records Management, Training and Internal Controls subprojects.

VI Subproject Budget.

The estimated subproject budget is shown below.

SUBPROJECT BUDGET Policies and Procedures				
Fiscal Year	FY 1997/ 1998	FY 1999	FY 2000	FY 2001
$$ in millions	---	---	1.0	1.0

VII Subproject Action Plan.

A. Designate Department-Level Subproject Director and Transfer Subproject from the Office of the Special Trustee to BIA

Subproject Realignment from OST to BIA: In August 1999 responsibility for this subproject was transferred from OST to BIA, recognizing that a majority of the policy and procedures issues remaining after the development of TFAS pertain to BIA programs and staff. *Transfer was completed in August 1999*

Staffing of Subproject: The subproject will require sufficient staff to plan and coordinate the execution of project tasks in concert with officials of Departmental bureaus and offices that perform trust functions as enumerated in Section IV. Because the analysis and revision of trust policies and procedures will require coordination of the review of statutes,

regulations and internal directives, the Department sought a director for the subproject with extensive experience in such matters at the Departmental level. The subproject office is being staffed by individuals experienced in Indian trust programs, legal issues, and/or analysis and coordination of governmental programs. The subproject director and staff will work with responsible officials in each affected bureau and office to ensure that the goals of the subproject are met. *The subproject's director was selected in August 1999. Completion of staffing is expected by June 2000.*

B. Develop Trust Principles for Departmental Management of Indian Natural Resources and Trust and Restricted Funds

The nature and scope of the federal trust responsibility to Tribes and individual Indians is not static, but rather continues to evolve. The Department will articulate the trust principles it will apply in the review of statutes, regulations, and internal program guidance governing management of its trust resources to ensure that they are consistent and properly integrated across the Department.

The subproject office will coordinate the development of the trust principles for issuance by the Department. Each affected office and bureau will use the trust principles as guidance for the identification, analysis and revision of its respective trust

policies and procedures, in accordance with Sections D, E, and F of this subproject.

a. *The initial draft of trust principles was completed in November 1999.*

b. *Tribal consultations were conducted in December 1999.*

c. *Revise, finalize and obtain Departmental clearance. Completion is expected by April 2000.*

C. Develop Departmental Regulatory Initiatives for 2000

1. **BIA:** After conducting a preliminary analysis of BIA trust programs in November 1999, BIA program directors and regional directors identified four priority areas of trust resource management for regulatory revision in Calendar Year 2000 (designated as the "first tier"):

- Leasing and Permitting
- Grazing
- Probate
- Tribal and Individual Funds Held in Trust

The BIA analyzed the four priority trust programs for regulatory review and revision using the initial draft trust principles and the comments on the draft received through tribal consultations. *Preliminary policy direction on issues raised during the regulatory drafting process was provided by the Assistant Secretary - Indian Affairs, the Deputy Commissioner of Indian Affairs, and the Principal Deputy Special Trustee in*

February 2000.

- Conduct tribal consultations through the National Congress of American Indians (NCAI) tribal leaders task force on trust policy and through local meetings conducted by BIA regional directors and/or agency superintendents.

- Publish proposed rules for first tier of revisions to trust regulations listed above. *Completion expected by June 2000.*

- After close of public comment period, BIA will review and consider comments and amend regulations as appropriate.

- Publish final rules. *Completion expected by December 2000.*

After the first tier regulations have been published, the BIA, in consultation with tribes, will evaluate and determine those areas that will be included in successive tiers of revisions of regulations and internal program guidance as outlined in Section G(1). Following this determination, a report will be sent to the Trust Policies and Procedures Council by March 2001.

2. MMS: In Spring of 2000, MMS expects to publish a final rule that will modify existing regulations for valuing oil produced from Indian leases by decreasing the reliance on posted oil prices. MMS initially proposed the rule on February 28, 1998, and modified that proposal on January 5, 2000. The comment period will close on March 6, 2000. After completing the analysis under paragraphs E and F, MMS may schedule additional revisions to its regulations.

3. OHA: By April 30, 2000, OHA will identify those portions of its regulations that need to be revised as interim final rules to accommodate the BIA's assumption of jurisdiction over certain probate cases, which is part of the BIA's "first tier" regulatory initiative during 2000. OHA will publish an interim final rule by June 30, 2000, including a provision informing the public that the BIA attorney decision-makers will also be authorized to make summary distributions. After completing the analysis under sections E and F, OHA may schedule additional revisions to its regulations.

D. Identify Departmental Programs and Functions that Affect Indian Trust

To assure that the Department's trust policies and procedures are integrated and consistent, each office and bureau with responsibilities for Indian trust resources will identify those programs and functions that affect trust assets, and collect and inventory the governing statutory and regulatory authorities and internal program guidance (including written policies, manuals, interagency agreements and directives). The offices and bureaus will consult with the subproject office as they develop their inventories. The subproject office will be assisted by the Departmental Office of Policy Analysis in working with the bureaus and offices.

Bureau and office reports are expected to be completed as follows:

Agency	Schedule
Bureau of Indian Affairs (BIA)	September 1999
Office of Surface Mining (OSM)	May 2000
Office of Hearings and Appeals (OHA)	May 2000
Office of Special Trustee (OST)	May 2000
Bureau of Reclamation (BOR)	May 2000
Bureau of Land Management (BLM)	June 2000
Minerals Management Service (MMS)	June 2000
U.S. Geological Survey (USGS)	June 2000
Fish and Wildlife Service (FWS)	July 2000
National Park Service (NPS)	July 2000

policies and procedures. The analyses should focus on specific trust management activities viewed against the backdrop of the Department's trust principles. The preliminary list of trust management activities to be examined include:

- Valuation of trust resources

- Conservation of trust resources

- Appeals process

- Consultation with tribes regarding use and disposition of trust resources

- Communication with individual Indian owners of trust resources

- Prevention of waste, alienation, and trespass

- Treatment of FOIA requests pertaining to trust resources

- Identification of new trust resources

- Protection of trust resources from depletion due to direct or indirect federal action

- Final agency disposition of trust assets

E. Analyze Departmental Functions Relating to Trust Resources

In consultation with the subproject staff, the Departmental bureaus and offices will analyze their trust program statutes, regulations and internal program guidance to identify changes necessary to assure comprehensive, consistent, up-to-date

In consultation with the subproject office, bureaus and offices will prepare reports to the Trust Policies and Procedures Council containing the results of their analyses with proposed schedules for revisions or development of statutory authorities, regulations, and internal program guidance. The BIA's report will identify its second tier of proposed regulations. The bureau and office reports are expected to be completed as follows:

Agency	Expected Completion
OST	August 2000
OHA	September 2000
BOR	September 2000
USGS	September 2000
BLM	October 2000
OSM	October 2000
MMS	November 2000
FWS	February 2001
NPS	February 2001
BIA	March 2001

working with the bureaus and offices.

For those issues the Trust Policies and Procedures Council determines can be resolved without further study, the subproject office will assist the bureaus and offices to identify statutory authorities, regulations and internal program guidance to be created or amended, including schedules for getting this work accomplished. Based on these schedules, bureaus and offices will revise and/or develop their regulations and internal program guidance generally in accordance with Sections G, H, and I respectively.

The subproject analysis of Departmental cross-cutting issues and identification of problematic areas to the Trust Policies and Procedures Council is expected to be completed by July 2001.

F. Analyze Cross-Cutting Issues and Problems

G. Develop and Publish Revised Regulations

The subproject office will review the reports submitted to the Trust Policies and Procedures Council to analyze issues that cut across the bureaus and offices, and to identify problems relating to the Department's management of trust programs. The subproject office will present its analyses to the Trust Policies and Procedures Council along with recommendations for resolving any problems. The subproject office will be assisted by the Office of Policy Analysis in

Bureaus and offices will prepare appropriate revisions to their respective sections of the Code of Federal Regulations. Tribal consultations will be conducted on all draft regulatory proposals prior to publication as proposed rules.

1. BIA Second Tier: Propose and finalize second tier regulations. *Completion date to be determined in accordance with schedules in Sections E and F.*

2. *Schedules for BLM, MMS, OSM, OHA, FWS, BOR, USGS, NPS, OST and additional regulatory actions by BIA beyond those identified in Section C will be*

determined based on analysis conducted under Sections E and F.

The highest priority regulatory projects are identified in Section C and, as noted, the BIA will complete its priority projects by December 2000. MMS will complete its priority project by Spring 2000. To the extent that bureaus identify additional regulatory initiatives, they will be scheduled for revision based on need, with the entire review and revision process complete by June 2004.

H. Revise and Develop Internal Program Guidance Where Necessary

Following the analyses and any revision of pertinent regulations as outlined under Sections E, F, and G, the bureaus and offices will develop corresponding internal program guidance (such as manuals, interagency cooperating agreements or other directives) as may be necessary. Development of this guidance will be in accordance with the Department's trust principles and the reviews of trust issues identified in Sections E and F. The subproject staff will work with the bureaus and offices to complete this task, including coordinating with any outside contractors, to ensure that programs consistently fulfill the Secretary's trust responsibility to Indian tribes and individual Indians.

The completion date for BIA, BLM, MMS, OSM, OHA, OST, NPS, FWS, BOR and

USGS will be determined based on results of analysis and regulatory developments described in Sections E, F and G.

I. Develop Proposed Statutory Revisions

Many of the federal statutes that address Indian trust programs were enacted in the nineteenth and early twentieth centuries and some reflect long-abandoned policies of the United States toward tribes and individual Indians. These statutes may need to be repealed, others extensively revised, and new authority may be needed to establish national policy guidance to reflect contemporary policy.

An analysis of these statutes will be undertaken as part of the analysis planned under Sections E and F, and plans for proposing repeal of, revision of, or new legislation will be developed based on the outcomes of those reviews.

Completion date for submission of proposed new legislation will be dependent on the outcomes under Sections E and F and will be coordinated with the Secretary's Office of Congressional and Legislative Affairs. Legislative recommendations are expected to be completed by 2002.

10. TRAINING

I Responsible Official

The Special Trustee for American Indians is the responsible official for this subproject. Richard Fitzgerald, Trust Policy Officer - Office of the Special Trustee, is responsible for general coordination of this subproject. As the training encompasses systems and various functional non-systems skills and knowledge training, the OST, BIA, and other entities are responsible for identifying their respective training needs.

II Statement of the Subproject Problem to the Managers

Lack of adequate training of staff to deliver Indian trust fiduciary responsibilities to American Indians has been cited in numerous Office of the Inspector General (OIG) and General Accounting Office (GAO) reports as a problem area. In addition to an historic lack of adequate training, new trust accounting and asset management systems are being installed to improve the discharge the Secretary's trust responsibilities to those Native American tribes and individual for which the Federal government holds and manages assets in trust. the comprehension and use of which will require a coordinated and specialized training effort.

III Statement of Objectives and Outcomes

The objective of the Training subproject is to increase DOI and Tribal trust personnel job performance and inter-organizational effectiveness by providing quality, targeted training to the OST, the BIA, trust land asset management organizations, and Tribal representatives and members centering on TFAS and TAAMS system implementation training, as well as non-system function/task training.

The desired result of this training is to provide trust system personnel with the necessary skills to support the fulfillment of the Secretary's trust fiduciary role through specific trust asset management, computer, accounting, investment, policies and procedures, and customer relations training. The outcome of the subproject will be enhanced job performance and improved efficiency of delivery of services to account holders and Indian land owners.

IV Relationship to the Reform Act of 1994

The American Indian Trust Fund Management Reform Act of 1994 (P.L. 103-412) stipulates that the Special Trustee plan for all phases of the trust management business cycle to ensure proper and efficient discharge of the Secretary's trust responsibilities to Indian tribes and individual Indians in compliance with the Act (Title III, Section 303, (a) (1)). Accordingly, this sub project plans for

delivery of both trust management and employee skills training relevant to the proper performance of the Federal government's fiduciary responsibilities to American Indians.

V Relationship to Other HLIP Projects

The Training subproject supports the system implementation and specialized skills training for the overall trust reform effort. It is aimed at improving Interior employee and Tribal representative job performance by providing necessary skills and knowledge to improve service delivery. The Training subproject draws from the Policies and Procedures, Records Management, and Internal Controls projects, and also complements these efforts.

VI Subproject Budget

The estimated Project Budget for this effort follows:

SUBPROJECT BUDGET Training				
Fiscal Year	FY 1997/ 1998	FY 1999	FY 2000	FY 2001
$$ in millions	.1	.4	5.2	3.0

Note: In late FY 2000, a contract is expected to be awarded to deliver training through 2001 with most of the expenditures occurring in last year.

VII Subproject Action Plan

System Implementation Training Training for the personnel working with the new Trust Funds Accounting System (TFAS) was provided by the systems contractors with subsequent training provided by OTFM staff. Training for the Trust Asset and Accounting Management System (TAAMS) is being provided by the systems contractors. Training for systems pilots and initial deployment has generally been identified and funded as a system cost. TAAMS training has been augmented by this subproject. For presentation purposes systems training for TFAS and TAAMS is discussed in this subproject although delivered under their respective HLIP subprojects.

Non-Systems Training The 1997 Needs Analysis included an extensive survey and review of training requirements in support of the Trust Management Improvement Project (TMIP). Based on extensive interviews with more than 300 Interior trust personnel and Tribal representatives across the nation, Macro International developed and compiled valuable information about, and significant support for, trust training. Interviewees were asked what training they had received, as well as what training they needed. Training, both trust and skills related, was cited by members of the Indian trust fund world as one of their most critical and urgent needs. For example, computer training was mentioned as the most frequent type of training received, yet it consistently ranked within the top five types of training needed across all types of staff. In addition, trust and accounting training were mentioned as two types of training

frequently received by staff, yet these topics were also mentioned as needed across staff types. Macro's findings about the training audience and the training environment included the following:

- A significant number of trust personnel live and work in isolated communities, making it difficult for them to travel to training sites or for trainers to reach them;

- Some personnel would prefer training at their work sites rather than having to travel;

- The training audiences are very diverse in age, culture, level of knowledge, language and geographical location. Length of time performing job tasks varies from a few months to many years;

- Training is needed at every staff level;

- Most personnel do not understand the "big picture" of how the trust system works, nor do they understand interorganizational relationships;

- Finding the time to attend training is difficult for most trust personnel, primarily because time away from the job results in a severe backlog, as backup staff are not available;

- Most people were unable to identify any criteria or standards for their job; many wanted guidance in this area;

- There are situations where training has been delivered but the new skills are not being used;

- Many tasks have *de facto* policies and guidelines in place, but there are few official policies and processes;

- Some tasks are still completed manually because people are uncomfortable using new technology;

- Personnel have new equipment or software but do not know how to use it.

Because the original needs assessment was conducted two years earlier, the Macro findings of 1997 were re-validated through a follow-up with field activities to verify and update training needs through 1999. Accordingly, Macro undertook a re-validation study, providing insight as to whether: (1) any of the training needs highlighted earlier had been met; (2) additional training was needed; and (3) the original needs continued to be accurate and relevant. Macro also took advantage of this re-validation study to collect information on the types of computer equipment and connectivity available at the various sites, available training rooms, and other training resources. The re-validation study included five sites visited, with follow up interviews conducted with 38 people. The results were provided in a written report, "1999 Assessment Results and Analysis" to OST on June 30, 1999. Based on this analysis, the contractor provided a list of recommended content areas for training employees, descriptions of the proposed courses, and a list of training vendors and resources provided in a Training Resource Database.

The plan and tasks outlined below will provide the assurance that trust management personnel are and will continue to receive quality, targeted training. The particular tasks and schedule necessary to successfully complete this

subproject are outlined in the following.

A. Schedule and Deliver Training by TFAS Contractor

Training on the new Trust Funds Accounting System is planned for both the users and the OST support personnel. Of this initial target, 45 staff were trained in the Western Region (including 27 OTFM and 18 BIA) with an additional 44 OTFM staff trained in Albuquerque, for a total of 89 staff trained by the contractor. In addition to this, OTFM trained 33 additional staff in Albuquerque.

Five OTFM personnel are designated and perform as "train-the-trainers" staff. This cadre schedules and provides training to new users during the conversion process at other sites. User training is scheduled approximately one month prior to implementation of the new TFAS in each region in a "just-in-time" approach to ensure user retention of the training information and skills. An extensive help desk provided by SEI Investments and OTFM aids in the conversion and training effort. *The Pilot training for 122 field staff, BIA and Albuquerque staff was completed on July 31, 1998.*

B. Provide TFAS Systems Training with TFAS System Deployment

To date, 285 OTFM. 275 BIA staff, 114 Tribal, 30 contractor and 8 FIMO personnel had been trained in the TFAS Systems Implementation Training beyond the initial training targeted for 105 personnel. Training on TFAS has been provided in the Western, Alaska, Pacific, Southwest, Navajo, Eastern, Rocky Mountain, Midwest, and Great Plains Regions. *Training for the 3 remaining sites, Eastern Oklahoma, Northwest, and Southern Plains Regions, prior to the planned TFAS deployment dates is planned for March 2000, immediately prior to conversion.*

C. Design, Schedule and Deliver TAAMS Training for Rocky Mountain Region Pilot

BIA's contractor will be providing training for the Rocky Mountain Region pilot of the TAAMS system including a pilot test of the train-the-trainer design simultaneously with the TAAMS Pilot at the Rocky Mountain Region sites. TAAMS was unveiled in Billings on June 25, 1999. *Training was conducted through September, 1999, for 35 trainees in Billings, 20 trainees in Dallas, an additional 90 trainees in Billings, and 20 trainees in Albuquerque.*

D. Deliver TAAMS Training Consistent with TAAMS System Deployment to BIA Regions

The BIA, in conjunction with contractors, will provide training in the deployment and implementation of the TAAMS system concurrent and consistent with the TAAMS system deployment as scheduled for each Regional office. The completion date for the training is tied to a final TAAMS deployment schedule.

E. Provide Remedial Systems Training (TFAS and TAAMS)

Additional analysis of training delivery before or after system deployment may reveal the need for supplemental training to reinforce earlier training, particularly as users either become more familiar with the system, or experience delays in deployment schedules. This will be determined on a case-by-case basis and in response to requests by local managers. *This task is on-going.*

F. Acquire External Professional Services of a Training Contractor

On January 15, 1999, a contract to develop guidelines for the on-going, long-term non-systems training of trust management personnel was awarded to Macro International, a professional training delivery contractor and provider. The contractor is assisting OST officials in evaluating curriculum, methodologies, and learning activities associated with this effort. The contractor will develop and present training delivery models based on participant needs and generally accepted practices.

G. Obtain Training Information From Trust and Realty Employees

Examine Prior Training Records and Data As a first step in determining the non-system training needs of potential OST/BIA/Tribal participants, the contractor examined all available data related to prior training. Significant categories of data collected included the identification of target population by name, position, pay grade, and location. Also, a 1997 survey of trust and realty employees in OST, BIA, and tribes with P.L. 93-638 contracts and compacts was provided to the contractor for development of employee training profiles and analysis.

The contractor presented a training plan approach that incorporated survey information including a training needs matrix based on the 1997 assessment which highlighted not only the training received and training needed at the time, but also included the additional comments

received. These comments were the basis for the next steps of conducting current assessment interviews, a data gap analysis, and addressing key problems. *This work was completed April 19, 1999.*

Revalidation of 1997 Survey Results

The contractor's review of the initial survey results was re-validated against the High Level Implementation Plan, system changes, re-engineering of trust processes, outsourcing of data processing, imaging capability, and other variables. The contractor re-interviewed a 10% sample of end-users in locations representing a cross section of user groups including staff from OST, Tribes, and the BIA. During the period of May - June, 1999, the contractor visited 5 sites and interviewed 38 staff including a broad cross-section of professions. Analysis of the interview data was examined by site and organizational type and summarized into four general categories (job specific training e.g. realty-related, computer-related skills, administrative skills and systems-related needs, e.g., TFAS). Additionally, training topics (such as stress management, customer service, time management, and team building) recommended by interviewees were taken into account.

A training needs analysis of the knowledge and skills by site and training history of staff at the selected sites was also performed. Final course recommendations were developed based on this analysis and by determining the gap between the 1999 re-validation and the earlier 1997 Needs Analysis. *A final report delineating recommended courses was provided to OST on June 20, 1999.*

Based on the assessment report provided by the contractor comparing current data collected with reference to the earlier 1997 Needs Analysis it was recommended that training include an emphasis on skills development in customer service, accuracy in accounting, sound financial and investment decisions and activities, accurate and timely reporting, and protection, use, and management of the trust assets. *A report on this analysis and training plan was provided to the Office of the Special Trustee and this process was completed June 30, 1999.*

H. Review Draft Training Plan for Non-Systems Training

The draft Training Plan was submitted for review on August 31, 1999. *Upon completion of Departmental review of the draft Plan, decisions on the locations, vendors, and methods of training delivery are expected by July 2000.* Review of the draft is underway.

The Draft Plan identified and provided recommendations for 28 different training courses; assessed the availability of existing courses; and developed an Access database of all training organizations providing a matrix of employee position titles for the training audience and courses recommended for each by BIA regional offices.

It is recognized that, within the 28 courses identified, certain of the subjects may require additional training modules to

ensure adequate and appropriate coverage of the topic across the trust workforce. For instance, the new Indian probate initiative will require that specialized training be provided on the administration of estates and Indian probate law, topics beyond the scope of the more general probate class recommended by the contractor.

The Plan recommended a regional deployment approach to training, in order to minimize travel costs and increase attendance. This deployment would ensure the provision of a minimum of 28 courses for the OST, BIA, MMS, BLM, OHA and Tribal employees performing trust responsibilities. The time table for completing initial non-systems training for these employees is anticipated to take upwards of 3 years.

In addition to a regional deployment, the plan included an implementation management plan and recommendations on the types and course mediums to be used by locality. The Plan provided summary data on the participants by region, across the BIA, OST, and Tribal programs, defining the training audience. In the listing of 28 courses recommended, all but 2 of these were noted as "off-the-shelf" and immediately available.

The Draft Plan includes an identification and grouping of providers who met selection criteria such as course length, training objectives, and past government training history through an Access Training Database. It also recommends six regional training sites and target audience locations based on the availability of facilities and the targeted number of participants to be

trained.

The Draft Plan provides the information necessary for a subsequent effort that will focus on the identification and selection of resources, vendors, and colleges that will provide the training within the timeframes determined in the final Training Plan. Recommended media delivery systems included desktop manuals, on-line manuals, videotapes, Web Pages, Distance Learning (video/satellite technology), and classroom instruction.

I. Identify and Select Training Management Contractor

A contractor will be selected to lead and manage the organization, logistics and delivery of non-systems training. *This is scheduled to be completed by June 2000.*

J. Approve Final Non-Systems Training Plan

By August 2000, the final non-systems training plan will be completed, approved by OST and published.

Based on the work provided by the contractor selected in task I and input from OST, this plan will include a comprehensive training schedule that details exactly which trust personnel will receive training, what training classes those persons will receive, where the classes will be located, and how

the classes will be made available to those persons receiving training. Decisions such as course delivery mediums, course length and class size, also will be described. The final plan will include a complete timetable that delineates the dates, subject matter and location for each class scheduled over the entire 3 year training period.

K. Award Contracts to Training Providers

The final plan approved by the Department in task J will identify what medium will be used to provide each course to every student. A variety of classroom-based and non-classroom-based course delivery methods may be used depending on such factors as course quality and length, overall cost, and the ability of students to travel to coordinated training sessions. In some cases, courses may be provided to students directly by commercial vendor, tribal college or government agency, while in other cases the preferred method of course delivery may be via the Internet, CDROM, or through video conferencing.

In accordance with the final training plan, in cases in which a course vendor is selected to provide class instruction, OST will award contracts to training providers following the approval of the plan scheduled for August 2000.

L. Identify Existing Coursework to Meet Skills Gap for Non-Systems Training

Macro International surveyed the market for available training courseware and identified a series of courses offered by federal government agencies, tribal colleges and private contractors that would be applicable to trust management personnel needs. These courses encompass information on such topics as basic Indian law, Tribal Constitutions and Tribal Court procedures, as well as customer relations and management skills, and are readily available. As new policies and procedures relating to trust management are developed, additional courseware to address those changes will be identified or created. *This task was completed October 31, 1999.*

M. Develop Courseware Not Available for Non-Systems Training

In the draft Training Plan submitted to OST on August 31, 1999, Macro International highlighted, from the 28 identified, 2 courses not available in the market. The two new courses would be tailored specifically to Indian trust management.

"Introduction to Trust" would provide an overview of basic Indian law, self-determination policies and the P.L. 93-638

process, tribal court procedures, probates, appraisals, budgets, and the responsibilities of OST, BIA and other Interior bureaus and offices. A course or courses on Trust Policies and Procedures would also be developed. This course would provide a general overview of newly developed or altered policies and procedures, or it may be subdivided into several courses focusing on particular policies that could be explored in greater depth and would be suited for targeted audiences.

For those instances when training will need to be designed and developed, an Instructional Systems Design (ISD) approach has been recommended. The contractor has developed a draft course syllabus for each of these, including the length of time needed to cover the topic, the mediums available and most suitable, employees to participate in the training, and an agenda of course topics. These new courses will be finalized by the contractor identified in task I. *The courses are scheduled to be fully developed by September 30, 2000.*

N. Training Implementation

Coordination and management of the extensive training effort for BIA, OST, and Tribal employees throughout the nation over the next few years requires a major logistical effort involving many of the following actions:

- Advertising and publicizing the training to the target audience;

- Developing a participant training infrastructure;

- Scheduling and delivering the training;

- Identifying the training outcomes;

- Refining and implementing the OST proposed assessment plan ;

- Conducting periodic evaluations;

- Revising the training program in accordance with evaluation findings;

- Developing, scheduling, delivering, and directing remedial/continual training efforts (Phase II Training).

The implementation of the training program is an on-going activity and one that will continuously be reviewed and reassessed throughout this training program.

O. Schedule and Deliver Non-Systems Training

The precise schedule for the delivery of non-systems training will be developed by the contractor identified in task I. Training will begin as soon as practicable after the final training plan is approved in August 2000 and contracts for the delivery of the delivery have been approved.

In this task, a contractor, aided and monitored by OST staff, will handle non-system trust management training for trust personnel of BIA, OST, MMS, BLM, OHA and related Departmental Offices.

The training delivery approach involves a two step process. First, there will be an initial deployment of the non-systems training modules, involving an approximate 3 year time frame. The second, or on-going phase of training, involving a more selected set of trust training modules, will commence for trust management staff as a continuing or remedial training effort to cover new employees and update or refresh course materials. This cycle should commence approximately 1 year after the initial non-systems training has been delivered to an individual or region.

While the Training Plan will focus on a prioritized list of labor categories from OST/BIA/Tribes, it is acknowledged that training must also include other staff and organizations involved in trust management, e.g., OHA, MMS, and BLM. Further, as discussed above, the number and type of courses offered is likely to evolve as more is learned about the work force and the direction of trust policies and procedures within Interior.

The Training Subproject will also provide training for specifically targeted functional areas. These courses will be developed as the need arises or as identified throughout the course of the project. For instance, training has been funded for staff engaged in Real Estate Appraisals and for staff involved in overall Trust Funds Management (provided by the Canon Institute). Other courses will be developed and offered on an ongoing basis.

11. INTERNAL CONTROLS

I Responsible Official

The responsible official for this subproject is the Special Trustee for American Indians. Kenneth Moyers, Compliance Officer, OST, is responsible for coordinating this subproject among the OST, BIA, MMS, BLM, OHA and the various Departmental Offices engaged in Indian trust management.

II Statement of the Problem

For decades, Tribes and individual Indians have voiced concerns over the Department's management and accountability for their trust funds and the overall management of natural resources.

Reviews conducted over the past 15 years by the GAO, the DOI's Inspector General, and independent accounting firms have confirmed the Indians concerns and identified serious financial management and internal control problems permeating every aspect of the trust management spectrum. These audit and external oversight findings and recommendations have focused on serious internal control problems and variances in program operations ranging from a lack of standardized policies, practices and procedures to the inability to confirm cash balances, and major inadequacies in accounting records and

related systems, lack of segregation of duties and deficiencies in field operation and management areas including collections and disbursements of Indian trust funds.

Areas of concern in Internal Controls include (but are not limited to) the following issues.

- Reconciliation of account balances with U.S. Treasury

- Investment practices

- Inconsistency in applying accounting policies and procedures - Lack of written policies/procedures

- Segregation of duties

- Understaffed operations (accounting, BIA realty/LTRO offices)

- Lack of adequate training

- Lack of BIA Agency/Area controls in Special Deposit account management

- Lack of timely updating of land ownership records - backlogs

- Lack of an accounts receivable system

- Systems controls/security controls are inadequate

- Trust fund accounts maintained without social security numbers, or categorized as "whereabouts unknown"

- Lack of disbursement policies and procedures/coordination at field operation level

- Collection functions lack policies and procedures; adequate oversight/ administrative review, separation of duties

- Lack of reconciliation of daily deposits

- Cash management

- Lack of reconciliation with U.S. Treasury suspense and budget clearing accounts

- Missing records-inconsistent BIA records management practices

- Verifications of oil and gas royalty collection data

- Lack of data processing controls

- Inconsistent and insufficient Indian Irrigation project payment management

- Inconsistencies in Judgement Fund distributions and management

III Statement of Objectives and Outcomes

The objectives of the Internal Controls subproject are twofold. First, to systematically address current and historically documented internal control issues to ensure the resolution of cited deficiencies across the entire trust management spectrum within the Department. A comprehensive mapping and indexing of reported deficiencies, and their relation to specific or new improvement action plans is underway. Second, to design and implement a comprehensive Trust Risk Management Program to monitor and evaluate the effectiveness of trust operations across the Department.

The implementation of actions specified under the other ten HLIP subprojects is expected to successfully resolve identified internal control problems and improve DOI trust management.

IV Relationship to Reform Act of 1994

The Internal Control subproject complements many other elements addressed under the other subprojects, but brings the continuing oversight needed to ensure that trust reform efforts are sustained. This effort specifically addresses the following requirements of the Trust Reform Act of 1994:

- Providing adequate systems for accounting for and reporting trust fund balances;

- Providing adequate controls over receipts and disbursements;

- Providing periodic, timely reconciliations to assure the accuracy of accounts;

- Determining accurate cash balances;

- Preparing and supplying account holders with periodic statements of their account performance and with balances of their account which shall be available on a daily basis;

- Maintaining complete, accurate and timely data regarding the ownership and lease of Indian lands;

- Establishing consistent, written policies and procedures for trust fund management and accounting;

- Providing adequate staffing, supervision, and training for trust fund management and accounting;

- Appropriately managing the natural resources located within the boundaries of Indian reservations and trust lands;

- Properly accounting for and investing, as well as maximizing, in a manner consistent with the statutory restrictions imposed on the Secretary's investment options, the return on the investment of all trust fund monies;

- Preparing accurate and timely reports to account holders (and others, as required) on a periodic basis regarding all collections, disbursements, investments, and return on investments related to their trust accounts.

V   Relationship to Other HLIP Projects

The Internal Controls subproject complements many elements addressed under the other subprojects within the TMIP, that is, new and enhanced systems, data clean up, policy and procedures, training, etc. However, this separate subproject for Internal Controls will ensure the full inventory of control deficiencies documented through audit and external oversight over the past 15 years are remedied on an issue by issue basis. Further the on-going Risk Management program developed and implemented under this subproject will be designed to monitor and evaluate ongoing trust management program operations to identify shortcomings or new problems that can be timely resolved. Lastly, formation of a separately staffed, stand alone risk management operation overseeing the Interior trust business cycle will afford the Secretary, as trustee, a continuing,

independent assessment of the efficacy of the Department's highly decentralized trust-related responsibilities.

VI   Subproject Budget

The estimated Project Budget for this effort follows:

SUBPROJECT BUDGET Internal Controls				
Fiscal Year	FY 1997/ 1998	FY 1999	FY 2000	FY 2001
$$ in millions	2.5	1.9	3.3	3.0

VII   Subproject Action Plan

The major tasks outlined in this subproject are designed to provide the framework to adequately resolve each of the finding and recommendation issue areas cited in the numerous audits and external oversight reports dealing with Indian trust funds and natural resource management, and provide the basis for an on-going risk management program.

A.   Develop Inventory of all Documented Internal Control Weaknesses

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The OST will develop an inventory of internal control weaknesses found over the past 15

years in various GAO, Office of the Inspector General (OIG), Congressional, and external reports dealing with weaknesses in the management of Indian trust funds and trust asset management. The OST is gathering a library of reports, which as of late 1999, included the following array of audits and reports focusing on these areas:

- 21 GAO Audits, Statements of Testimony before Congressional committees, letters, and reports highlighting recommendations in over 65 categories of areas of concern and internal controls;

- 24 OIG Audits conducted since 1988, listing over 40 areas of recommendations;

- 11 additional OIG audits providing extensive listings of material weaknesses ;

- The U.S. House of Representatives Committee on Government Operations Report (102-499) of April, 1992 listing over 27 areas of concern, findings, and recommendations;

- 3 recent OIG Annual Financial Statement Audits (1995, 1996 and 1997) listing over 41 areas of concern and internal control-related weaknesses;

- 5 recently conducted audits in draft report format, highlighting over 25 recommendations in areas of concern;

- 16 MMS and BLM related audits.

This initial task was completed on May 29, 1998, and is ongoing.

B. Catalogue Relevant Audit Findings and Recommendations into an Analysis Framework

Using the reports and inventory of audit findings and recommendations, the OST has catalogued these findings into internal control areas and crosswalked them to the HLIP subprojects (similar to the above summation) to enable examination of the extent of coverage of on-going trust improvements. *This task was completed on May 29, 1998.*

C. Research and Select Template for Development of Risk Management Program

Given the magnitude and numbers of internal control deficiencies highlighted over the past several years in the Department's Trust Fund management activities, the OST turned to information and techniques available from multiple sources, mostly private, to identify an approach to cure internal control problems and develop a methodology to actively monitor and evaluate day-to-day progress and effectiveness of the improved Indian trust management activities.

Throughout the 1980's and into the early 1990's significant attention was given this

area and several case studies were conducted to assess the cause and prevention of internal control breakdowns experienced in a variety of financial management situations. The Treadway Commission, sponsored by the American Institute of Certified Public Accountants, the Financial Executives Institute, and other similar organizations, issued a comprehensive study in the late 1980's. The sponsoring organizations, supported by several major corporations such as Shell Oil, IBM, banks, consulting firms, etc., expanded the studies and in 1994 the AICPA issued the final *Integrated Framework for Internal Control systems.*

The OST reviewed these documents and others available from many organizations, even some international organizations, and, based on a recommendation from a member of the Special Trustee's Advisory Board, selected the Treadway/AICPA concept as the template to use in building the Department's comprehensive internal control/Risk Management monitoring and evaluation system for the Trust Management Improvement Program. *This task was completed on February 12, 1999.*

D. Identify and Develop Remediation for Acute Internal Control Weaknesses

An analysis of unresolved weaknesses identified in the most recent external audit of the OTFM by Griffith and Associates identified the most acute internal control weaknesses, and remediation began at once. In conjunction with the Department's Management Control and Audit Follow-up Program, OST staff prepared an action plan, tied to the ongoing trust reform effort, which outlines remediation for specific audit findings. The action plan includes special efforts that have been completed and others that commenced shortly after June 1999, and also characterized other special emphasis activities needed within subprojects of the TMIP. This task was completed on June 3, 1999.

E. Develop Organization and Staffing for Trust Risk Management Office

The Trust Risk Management Office will be based in Albuquerque, New Mexico, but report directly to the Office of the Special Trustee. It will annually perform or direct field level reviews and provide technical assistance for Indian Trust Operations at some 300 OST, BIA, Tribal, MMS, BLM, and OHA sites. It will apply traditional trust risk management techniques in its reviews and analyses of Indian Trust Policies, Procedures, and Systems development and operations, using multi-disciplinary teams. It will coordinate and partner with current oversight staff in OST, BIA, MMS, BLM, and the OIG as appropriate. On an annual basis, the field level review and analyses results will be consolidated to provide a Department-wide Risk Management assessment for Indian Trust Management operations.

The staff will include specialists in trust, range, natural resources, forestry, mineral, and land operations, as well as auditors and computer specialists. The necessary administrative documents are being drafted to establish the organization and field one team in FY 2000. Plans are to add two additional teams in FY 2001. The full staffing complement is estimated to be 23-25 people. *This task is scheduled to be completed by December 2000.*

F. Map Weaknesses to Current Improvement Efforts

All reported internal weaknesses deemed by the Department to be unresolved, will be independently reviewed to ensure that High Level Implementation Plan subprojects are adequately addressing the remedial actions necessary to address the reported problems. Additional review will be performed and coordination with subproject teams and program managers where necessary will be completed to ensure that actions planned are sufficient to resolve all past deficiencies. *The scheduled completion date is April 2000.*

G. Analyze Weaknesses to Determine Current Status - Resolved or Unresolved

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Using the internal control areas established on the inventory and catalogue of the audit findings and recommendations, the OST, in coordination with the reported bureau or Office, will analyze the weaknesses highlighted within these findings to determine the current status of the findings. An assessment will be made regarding whether (1) the findings have been resolved, (2) they will be resolved through the successful completion of subprojects in this plan, or (3) supplementary efforts in addition to those specified in this plan are required by the respective bureau or office. *The scheduled completion date is May 2000.*

H. Modify Treadway Approach to Interior Situation; Develop Monitoring Procedures

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Given the types of organizations represented in the group that developed and issued the Integrated Framework for Internal Control (Treadway approach) the concepts are very encompassing. The extensive frameworks are designed for multinational corporations with varied business interests, not unlike the decentralization of Indian trust management responsibilities throughout the Department. Initial assessments are that the Department's internal control/risk management system should and can include many of the framework's features. The goal is to adapt the best of the features and do so in a manner that is effective, but not overly burdensome. The system design concepts for TAAMS and TFAS include appropriate features for systems and operations controls.

The broader program goals and objectives for the Department's Trust Management programs require further definition and coordination at all levels in the Department. This will be difficult since several different bureaus and organizations within those Bureaus have critical portions of the overall trust management reforms to complete in order for significant improvements to be realized. Compounding the difficulties of successful accomplishment of reforms are the competing organizational programs and goals and extent of geographical decentralization of the Department's trust management activities.

For these reasons, Departmental leadership and, in turn, its Bureau and Office program managers must clearly define and communicate the overall goals and objectives of trust management improvements, and the vision for future trust management operations. Further, they must ensure that the tools necessary to accomplish the goals and objectives are being met.

To report, both within and externally, whether the goals are being accomplished, an independent monitoring and evaluation program must be designed and supported. Such an internal review and technical assistance program is being designed and will be implemented as the Trust Risk Management Office under OST. In the event OST sunsets as provided under Section 302(a)(2)(C) of the Reform Act, the appropriate organizational alignment of the Trust Risk Management Office will be reevaluated. It will be separate from normal program results reporting and will advise the senior leadership of the extent to which goals are being accomplished and will include in its reporting, the areas of high risk where additional emphasis, redirection, and/or resources must be applied to resolve new deficiencies or prevent relapses of prior major internal control weaknesses.

As this program evolves, it will of course be closely coordinated with senior leadership and program managers. Based on input from the designated bureau trust improvement program managers, follow - through monitoring procedures for problem resolution will be developed. The scheduled completion date is July 2000.

I.   Inventory and Catalogue Internal Controls in TFAS, TAAMS, and MMS Systems

The system design concepts for TAAMS, TFAS, and MMS Royalty Management systems, include appropriate features for internal systems controls and should work effectively when implementation is complete. To fashion a complete and comprehensive risk management review program, an in-depth knowledge and understanding of the resident internal controls designed into these systems will be compiled and documented by the Trust Risk Management Office. The Trust Risk Management staff will work directly with the systems contractors to identify and document existing system internal controls. *This effort will be completed by August 2000.*

J. Risk Management Program Final Draft

Parallel with the efforts of analyzing the continuing internal control deficiencies and ensuring that corrective measures are incorporated into ongoing improvement efforts under other subprojects in this plan, the OST is drafting a program plan to design and implement an ongoing review, monitoring, and reporting process that will (1) confirm trust reform accomplishments, (2) highlight problem areas and offer recommendations for resolution, and (3) serve as an "early alert" to senior leadership and program managers where future internal control/program deficiencies are developing. *The scheduled completion date is August 2000.*

K. Coordinate with Affected Bureaus and Offices to Develop Action Plans

Based on the inventory, cataloging, analysis, and mapping of weaknesses to the Trust Management Improvement Project, the OST will coordinate with the designated bureau trust improvement project managers to develop remedial actions for each internal control point.

This process entails:

- Identification of relevant internal control findings to be corrected and tracked in the project to date;

- Coordination with program managers to determine appropriate corrective action and milestones within the parameters of the trust improvement project.

The scheduled completion date is September 2000.

L. Coordinate Risk Management Program with Revised Trust Policies and Procedures

The Policy and Procedures subproject includes a requirement to institute a program for audits and reviews of trust fund management policies, practices, and procedures. As the Trust Risk Management Program is developing, it will be closely coordinated with the Policy and Procedures working group to ensure the review plans are complementary. This coordination will consider whether these reviews are better done separately or become a part of the planned risk management reviews. *The scheduled completion date for this task is October 2000.*

M. Publish Final Risk Management Program Handbook

It is planned to conduct some form of review at least annually of every location/activity involved in trust fund management operations. This will be done through monitoring and oversight by the Trust Risk Management Office and varying levels of detailed field reviews. Many of the reviews will need to be performed by field office program staff and others possibly on special assignments. To ensure consistency in approach, coverage, and reporting, a handbook for use by all organizations and staff assigned to conduct risk reviews will be published. *The scheduled completion date for this task is November 2000.*

N. Establish Continuing Risk Management Presence to Prevent Relapses

Successful accomplishment of the goals of this subproject, many of which involve monitoring and evaluating the sufficiency of resolution of internal control weaknesses in most other sub-projects, coupled with the implementation of a system and process for monitoring future trust management activities will constitute the needed quality assurance processes and programs necessary for the Department to self-assess its Indian trust management activities. The OST will oversee implementation steps for

remedial actions and, through the establishment and operation of a permanent Trust Risk Management Office, provide a continuing quality assurance presence to prevent relapses. *The scheduled completion date is December 2000.*

| **1. OST DATA CLEAN UP** | **Subproject Manager: Doug Lords, OST** |

Milestone   Schedule

A. Establish Project Charter .... Completed 11/30/96
B. Organize Project and Temporary Staff to Conduct Records Cleanup Pilot Completed 12/31/96
C. Select and Cleanup a Test Agency .... Completed 03/31/97
D. Select Additional Test Site and Cleanup Records .... Completed 06/30/97
E. Develop and Refine Cleanup Processes .... Completed 06/30/97
F. Acquire Contractor to Perform Cleanup
    of Administrative Records in 18 Months .... Completed 08/27/97
G. Select Pilot Site - BIA's Phoenix Area .... Completed 11/13/97
H. Task Contractor for Methods Study, Planning, & Production Gear-up ... Completed 12/31/97
I. Task Contractor to Initiate, Conduct and Complete Cleanup .... Completed 01/05/98
J. Gather Western Region Trust Records Centrally in Albuquerque .... Completed 02/03/98
K. Finish Cleanup of Western Region Administrative Trust Records .... Completed 03/29/98
L. Continue Gathering IIM Administrative Trust Jacket Folders
    and Trust Records from Other Areas .... Ongoing
M. Oversee Contractor's Efforts and Report on Progress .... Ongoing
N. Resolve Jacket Folder Retention/Production Issue with Tribes .... Ongoing
O. Complete IIM Jacket Folder Cleanup .... Completed 09/30/99
P. Identify, Report on, Organize and Initiate Follow-on Post Conversion Cleanup Efforts: Ongoing

      Eliminate Duplicate Accounts .... (3/31/00)
      Transfer Tribal IIM Accounts .... (3/31/00)
      Locate Missing Documents .... Ongoing
      Revise Management Coding (Plan Development) .... (9/30/00)
      Continue Research/Resolving Whereabouts Unknown Accounts (Eval..Point 9/30/00)
      Resolve Special Deposit Accounts (Plan Development) .... 9/30/00)
      Settle Issues with Small Balance/Inactive Accounts .... Ongoing
      Resolve Accounting Discrepancies .... Ongoing

2. BIA DATA CLEAN UP AND MANAGEMENT

Subproject Manager: Dom Nessi, BIA

Milestone   **Schedule**

A. Assign BIA Data Administrator and Data Administration Team .... Completed 08/31/98
B. Identify Data Elements, Standards, & Metrics & Ownership Issues .... Completed 03/26/99
C. Perform Data Quality Analysis .... Completed 12/31/98
D. Procure Data Cleanup Contractor Assistance .... Completed 03/01/99
E. Develop Data Cleanup Strategy, Policies and Procedures .... Completed 08/31/99
F. Train on Data Cleanup and Data Quality Policies and Procedures .... Ongoing
G. Perform Pre-Deployment Data Cleanup in Current Systems .... To Be Initiated 06/30/00
H. Monitor Data Integrity for Each BIA Office .... Ongoing
I. TAAMS Post-Deployment Cleanup 12/31/03
J. Post Data Cleanup Auditing .... Ongoing
K. BIA Data Management .... Ongoing

3. PROBATE BACKLOG

Subproject Manager: Charles Breece, OHA
Larry Scrivner, BIA

Milestone   **Schedule**

A. Strategies to Reduce Backlogs
    Establish Attorney Decision Maker Positions as An Alternative Means of Deciding Cases 07/31/00
    Elimination of Summary Distribution Backlog 12/31/ 00
    Complete Decisions on Current Docket and Incoming Cases 09/30/02
    Complete Decisions on Pending Cases 09/30/02
    Posting and Recordation of Probate Orders 12/31/01
    Contract for Elimination of Probate Case Processing Backlog 12/31/02
B. Address Probate Backlog Created by <u>Youpee v. Babbitt</u> 09/30/04
C. Conduct Two-Phased Indian Probate Reinvention Lab to Develop a Reengineered Probate
    Process .... Completed 11/29/99
D. Establish OHA / BIA Implementation Team to Coordinate Implementation of Redesigned Probate
    Process 09/30/00
E. Authorize Increased Summary Distribution Threshold for BIA Agency Superintendents
    .... Completed 08/24/99
F. Legislation to Authorize Hiring Indian Probate Judges .... Completed 11/99
G. Hire Additional OHA Staff and Reopen Probate Offices 09/30/00
H. Complete Staffing Needs Assessment to Determine Staffing Levels at BIA Field Office
        Phase I 06/01/00
        Phase II 03/31/01
I. Hire BIA Probate Staff and Establish BIA Professional Corps 06/30/01
J. Identify Indian Probate Training Needs 08/31/00
K. Expand Existing OHA Caseload Tracking into a Joint Interim System 12/31/00
L. Convert Interim Probate Tracking into a Comprehensive Probate Tracking and Caseload
    Management System 10/31/00
M. Amend OHA Regulations and Promulgate BIA Regulations that Establish Policies and
    Procedures for the Indian Probate Program
    BIA Draft Regulations. 06/30/00
    Promulgation of BIA Regulations 12/31/00
    Promulgation of OHA Regulatory Amendments 07/31/01
N. Continue to Identify and Implement BIA and OHA Best Practices through Implementation Phase
    of Reengineered Probate Process .... Ongoing
O. Coordinate Implementation of Improved Probate Record Keeping Strategies 07/31/00
P. Initiate Customer Service Outreach .... Initiate 09/30/00; ongoing thereafter
Q. Initiate Partnerships with Other Federal Agencies 08/31/01
R. Establish Partnerships with Indian Tribes
        Inventory of P.L. 93-638 Tribes 12/31/00
        Model Memorandum of Understanding 09/30/00
        Inventory of Tribal Inheritance Codes 03/31/01
        Model Inheritance Code 06/30/01

4.   BIA APPRAISAL PROGRAM

Subproject Manager: Gabriel Sneezy, BIA

Milestone	**Schedule**
A. Determine and Ensure Certification Qualifications of BIA Appraisers	Ongoing
B. Development of a Real Estate Appraisal Handbook	Completed 10/14/98
C. Develop and Maintain Database for Tracking Appraisals	Completed 06/30/00
D. Evaluate and Survey Fair Market Value Appraisal Requirements	06/30/00
E. Hire Bureau-wide Chief Appraiser	Completed 06/21/99
F. Create Appraisal Technical Board	Completed 04/27/99
G. Implement a Standard Appraisal Request Form	Completed 11/22/99
H. Implement an Automated Comparable Sales/Lease Database System	09/30/00
I. Contract On-Line Real Estate Providers in Locations Where Available	04/30/00
J. Upgrade the Bureau's Automated Systems	09/30/00
K. Realign Line Authority to Ensure Consistent Management and Overview of Appraisal Program	05/31/00
L. Reduce Rocky Mountain Region Appraisal Backlog	08/31/00

5.   TRUST FUNDS ACCOUNTING SYSTEM

Subproject Manager: Dianne Moran, OST

<u>Milestone</u>	<u>Schedule</u>
A. Obtain DOI and CIO Approval for the System and Approach	Completed 11/23/97
B. Develop and Submit a RFP and Statement of Work	Completed 12/30/97
C. Select Pilot Site from Among BIA Regional Offices	Completed 11/13/97
D. Publish RFP for TFAS	Completed 01/05/98
E. Receive and Evaluate Proposals	Completed 03/26/98
F. Award TFAS Contract	Completed 03/26/98
G. Complete OST Data Cleanup for Western Region	Completed 03/29/98
H. Select and Train Conversion/Implementation Team	Completed 04/20/98
I. Acquire External Consulting Services to Assist in Implementation	Completed 02/15/99
J. Develop and Implement Conversion Strategy	Completed 06/23/98
K. Train Support and User Personnel	Completed 08/31/98
L. Verify and Convert Data	Completed 08/31/98
M. Acquire and Distribute End User Work Stations to Field	Completed 08/31/98
N. Initiate and Pilot New Trust Funds Accounting System	Completed 08/31/98
O. Convert Alaska and Pacific Regions	Completed 08/31/98
P. Convert Southwest and Navajo Regions	Completed 01/31/99
Q. Convert Tribal Accounts and IIM Pool to New Trust Funds Accounting System	Completed 02/28/99
R. Convert Eastern Region	Completed 04/30/99
S. Convert Rocky Mountain Region	Completed 05/30/99
T. Complete Data Cleanup for Remaining Conversion Sites	Ongoing[1]
U. Convert Midwest Region	Completed 07/29/99
V Convert Great Plains Region	Completed 10/30/99
W. Deploy TFAS to Remaining Sites:	
Convert Southern Plains Region	03/31/00
Convert Eastern Oklahoma Region	03/31/00
Convert Northwest Region	03/31/00
X. Stabilizing and Adjustment	05/31/00

1 DataCom, Inc. completed cleanup of IIM jacket files in its possession
through July 1999. Three tribes have not released jacket files; discussions have taken place,
but as yet no resolution has occurred.

6. TAAMS SYSTEM   Subproject Manager: Dom Nessi, BIA

Milestone   Schedule

	Milestone	Schedule	
A.	Select Pilot Site	Completed	11/13/97
B.	Acquire External Professional Consulting Services	Completed	03/31/99
C.	Assemble Senior BIA and OST Team to Develop Requirements	Completed	04/24/98
D.	Prepare and Publish RFI for COTS Systems	Completed	06/19/98
E.	Organize Joint Technical Team to Develop Detailed Specifications & RFI	Completed	09/30/98
F.	Obtain DOI Approval (TIA/IRMC) for System and Approach	Completed	09/11/98
G.	Develop RFP Using Joint BIA/OST Technical Team/Systems Consultant	Completed	08/27/98
H.	Select TAAMS Project Management Team	Completed	11/30/98
I.	Award Contract to Successful Proposer	Completed	12/02/98
J.	Develop System Modification and Deployment Strategy with Contractor	Completed	05/31/99
K.	Complete System Modification Effort		
	- Title portion		05/30/00
	- Realty functions and interfaces		08/31/00
L	Analyze National Requirements for User Work Stations - Rocky Mountain Region		[1]
M.	Conduct System Testing	Completed	11/22/99
N.	Complete Training of Support and User Personnel at Rocky Mountain Region	Completed	06/30/99
O.	Complete Independent Verification and Validation	Completed	02/28/00
P.	Initiate TAAMS Pilot at BIA's Rocky Mountain Region	Completed	06/25/99
Q.	Perform User Test at Pilot site	Completed	02/04/00
R.	Deployment Decision Review		03/31/00
S.	Deployment to BIA and Tribal Sites		
	- Title portion start		05/30/00
	- Realty functions and interfaces start		08/31/00
T.	Complete TAAMS Deferred Modifications		09/30/00
U.	TAAMS Ongoing Operations		Ongoing

TAAMS Documentation and Supporting Information .... As needed

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[1] Hardware to be provide in concert with TAAMS deployment

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7. MMS SYSTEM REENGINEERING   Subproject Manager: Milton Dial, MMS

Milestone	**Schedule**

A. Initiate Program-Wide Reengineering With Full-Time Design Team .... Completed 04/30/97
B. Identify Processes for Business Process Review .... Completed 05/31/97
C. Benchmark the Processes .... Ongoing
D. Map Processes .... Completed 07/11/97
E. Obtain Customer/Constituency Input .... Ongoing
F. Complete Preliminary Design Document/Decision to Proceed .... Completed 03/31/98
G. Complete Prototyping and Pilot Testing .... Completed 09/30/98
H. Complete Project Capital Investment Plan and Independent Verfication and Validation 09/30/98
I. Issue Implementation Plans - Road Map to 21st Century .... Completed 11/30/98
J. Implement Process Leading to Award of Financial System Contract .... Completed 09/23/99
    - Issue Request for Proposals (RFP) for COTS-based
      Financial System, Relational Data Base Management
      System, and Spiral Development Strategy to Include
      Date Warehouse Structure .... Completed 04/09/99
    - Conduct Vendor on-site Visits with MMS/RMP Staff .... Completed 05/31/99
    - Receive RFP Proposals and Begin Evaluation .... Completed 06/02/99
    - Evaluate Proposals, Including COTS
      Specific Independent Functional Validation .... Completed 07/09/99
    - Complete Evaluations and Commence Procurement
      Activity/Negotiations .... Completed 07/23/99
    - Award Financial System Development Contract .... Completed 09/23/99
K. Develop Financial system Consistent with Contract Deliverables Schedule
    and Transition and Training Strategies 01/31/00
    - Initiate Development Contract Mobilization Under 120-day Activity Plan   Completed 10/01/99
    - Establish Financial Contract Management Plans and Schedule for Development
      Deliverables from Award Date to 9/30/01, and Commence Systems Analysis,
      Design and Development Activities which.will include Testing and Independent
      Validation of TAAMS/TFAS interfaces .... Completed 01/31/00
    - Complete COTS Fit Analysis 02/28/00
    - Complete General and Detailed Application Design 01/31/00
    - Build and Test Application Components 02/28/01
    - Design, Build and Test Data Conversion 04/30/01
    - Plan and Execute Functional and Performance Acceptance Test 08/31/01
L. Complete Development and Delivery of Financial System, Relational Data
    Base Management System and Related Modules 09/30/01
M. Award Compliance System Contract and Complete Development and Installation .... TBD
N. Complete Development and Delivery of Compliance System 09/30/01

8. RECORDS MANAGEMENT Subproject Manager: Ken Rossman, OST

Milestone   **Schedule**

A. Establish OST/BIA Working Group to Coordinate Joint Records Solution Completed 02/11/98
B. Transfer Control Over Trust Financial Records from BIA to OST ...... Completed 03/05/98
C. Develop Joint Procedures for Records Access .... Completed 06/09/98
D. Develop Agreement Between OST and BIA on Records Operations .... Completed 06/09/98
E. PreparePlan/Gain Approval of Records Imaging Technology .... Completed 06/30/98
F. Commence Records Imaging Efforts .... Completed 06/30/98
G. Initiate Development of Records Control Schedules .... Completed 09/30/98
H. Develop an Agreed Upon Approach to Indian Trust Records Management Completed 05/19/99
I. Eliminate Existing Disposition Backlogs at BIA Agencies 05/31/02
J. Complete Systematic Centralization of OST Financial Trust Records .... Completed 10/08/99
K. Hire Records Management Specialists .... Completed 01/31/00
L. Develop and Issue Records Manuals, Training Aids, and
    Technical Assistance. 12/31/01
M. Train Records Staff and Trust-Related Program Personnel 12/31/01
N. Lift BIA Moratorium on Retiring Records to Federal Records Centers 03/31/00
O. Resolve Jacket Folder Retention/Production Issue with Tribes .... Ongoing
P. Analyze Records Storage Requirements 12/31/01
Q. Survey Trust Records Retention and Safeguarding .... Completed 12/31/99
R. Establish Advisory Committee on Records 08/31/00
S. Establish Life Cycle Database (Inventory) for Trust and Other Records 12/31/01
T. Establish Evaluation Teams and Begin Cyclic Evaluations of Records Programs 04/30/00
U. Initiate Training for Compacted and Contracted Trust Records .... Completed 12/31/99
V. Initiate Study of BIA Imaging Needs 12/31/00
W. Initiate Action to Replace Historical Records with Working Copies 05/30/00
X. Review Trust Records Policies and Procedures with MMS, BLM,
    and DOI and Establish Continuing Dialogue 02/29/00
Y. Award New Contract for OST Imaging 07/01/00
Z. Publish Proposed Regulations for Compacted/Contracted Trust Program Records ... 12/31/00
AA. Complete Plan to Comply with Electronic Records Regulations 03/31/01
BB. Complete Vital Records Plan 04/30/01
CC. Publish Trust Records Instructional Guide in Conjunction with MMS, BLM and OHA . 12/31/00
DD. Complete Submission of Records Control Schedules to NARA 06/30/01
EE. Establish Pilot Project(s) for Electronic Record Keeping 12/31/00
FF. Complete Analysis of BIA Records Imaging Requirements 12/31/00
GG. Complete Analysis of Records Storage Requirements 12/31/01
HH. Complete Project to Cleanup Existing Disposition Backlog at BIA Agencies 05/31/02

9. POLICY AND PROCEDURES   Subproject Manager: Art Gary, AS-IA

Milestone   **Schedule**

A. Designate Department-Level Project Manager and Transfer Subproject
        From the Office of the Special Trustee to BIA
                        - Transfer of subproject .... Completed 08/31/99
                        - Staffing of subproject 06/30/00
B. Develop Trust Principles for Departmental Management of Indian Natural Resources and Money
                        - Initial draft of trust principles .... Completed 11/30/99
                        - Tribal consultations .... Completed 12/31/99
                        - Departmental clearance 04/30/00

C. Develop Departmental Regulatory Initiatives
                        - BIA: Publish proposed rules 06/30/00
                                Publish final rules 12/31/00
                        - MMS: Modified proposed rules .... Completed 01/05/00
                                Comment period closes 03/06/00
                                Further action .... TBD
                        - OHA: Publish final rule .... TBD
D. Identify Departmental Programs and Functions that Affect Indian Trust Resources
                        - BIA .... Completed 09/30/99
                        - OST 05/30/00
                        - OSM 05/30/00
                        - OHA, BOR 05/30/00
                        - MMS, BLM, USGS 06/30/00
                        - NPS 07/31/00
                        - FWS 07/31/00

E. Analyze Departmental Functions Relating to Trust Resources
                        - OST 08/31/00
                        - OHA 09/30/00
                        - BOR 09/30/00
                        - USGS 09/30/00
                        - OSM 10/31/00
                        - MMS 11/30/00
                        - FWS 02/28/01
                        - BIA 03/30/01
                        - BLM 10/31/00
                        - NPS 02/28/01

F. Analyze Cross-cutting Issues and Problems 07/31/01
G. Develop and Publish Revised Regulations 06/30/04
H. Revise and Develop Internal Program Guidance Where Needed .... TBD
I. Develop Statutory Revisions 12/31/02

10.　TRAINING

Subproject Manager: Richard Fitzgerald, OST

Milestone　　　　　　　　　　　　　　　　　　　　　　　　　　**Schedule**

A.　Schedule and Deliver Training for 105 Personnel by TFAS Contractor . . . . . . Completed 07/31/98
B.　Provide TFAS Systems Training in Line with Deployment 03/31/00
C.　Design, Schedule and Deliver TAAMS Systems Training
　　for Rocky Mountain Pilot . . . . Completed 09/30/99
D.　Deliver TAAMS Training Consistent with TAAMS System Deployment for BIA Areas . . . . Ongoing
E.　Provide Remedial Systems Training (TFAS and TAAMS) Where Requested . . . . Ongoing
F.　Acquire External Professional Services of Training Contractor . . . . Completed 01/15/99
G.　Obtain Training Information from Trust and Realty Employees . . . . Completed 04/19/99
H.　Review Draft Training Plan for Non-Systems Training 06/30/00
I.　Identify/Select Training Management Contractor 06/30/00
J.　Finalize and Approve Training Plan for Non-Systems Training 08/31/00
K.　Award Contracts to Training Providers 08/31/00
L.　Identify Existing Courseware to Meet Skills Gap for Other Training . . . . Completed 10/31/99
M.　Develop Courseware Not Available for Non-Systems Training 09/30/00
N　Implement Training . . . . Ongoing
O.　Schedule and Deliver Non-Systems Training . . . . Ongoing

11. INTERNAL CONTROLS   Subproject Manager: Ken Moyers, OST

Milestone   **Schedule**

A.	Develop Inventory of Internal Control Weakness	Completed 05/29/98
B.	Catalogue Relevant Audit Findings into Analysis Framework	Completed 05/29/98
C.	Research and Select Template for Risk Management Program	Completed 02/12/99
D.	Identify and Develop Remediation For Acute Internal Control Weakness	Completed 06/03/99
E.	Develop Organization and Staffing Proposal for Trust Risk Offices	12/31/00
F.	Map Weaknesses to Current Improvement Efforts	04/30/00
G.	Analyze Weaknesses to Determine Current Status - Resolved/Unresolved	05/30/00
H.	Modify "Treadway" Approach to Interior Situation; Develop Monitoring Procedures	07/31/00
I.	Inventory and Catalogue Internal Controls in TFAS, TAAMS, MMS	08/31/00
J.	Risk Management Program Final Draft	08/31/00
K.	Coordinate with Affected Bureaus/Offices to Develop Action Plans	09/30/00
L.	Coordinate Risk Management Program with Revised Trust Policies and Procedures	10/31/00
M.	Publish Final Risk Management Program Handbook	11/30/00
N.	Establish Continuing Risk Management Presence to Prevent Relapses	12/31/00

OVERSIGHT, MONITORING AND ACCOUNTABILITY

Trust Management Improvement Steering Committee. Management of Indian trust lands and Indian trust funds is a Departmental mission. Ultimate responsibility for its accomplishment rests with the Secretary of the Interior. The Special Trustee, with the full participation of other Departmental officers, took the lead in developing a *High Level Implementation Plan* and overseeing its execution. The project is accomplished under the guidance and oversight of the Trust Management Improvement Steering Committee, chaired by the Secretary, with membership as depicted in the chart below. Between scheduled meetings of the Steering Committee, the Assistant Secretary - Policy, Management and Budget moderates and coordinates meetings with appropriate Committee members and staff to deal with any resource issues, roadblocks, or other matters that cannot wait until the next Steering Committee meeting for resolution.

Trust Management Improvement Steering Committee

```
                    Secretary
              Department of the Interior

Assist. Secretary    Assist. Secretary       Chief Information     Solicitor
Indian Affairs       Policy, Mgmt. And Budget Officer

        Assist. Secretary        Special Trustee for
        Land & Minerals Mgmt.    American Indians
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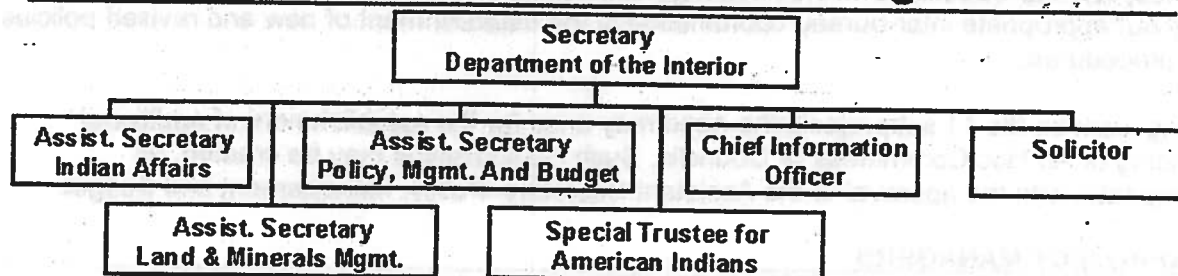
The Chief Information Officer provides Departmental oversight on the systems and information resources management aspects of these efforts.

The respective heads of Bureaus and Offices are individually responsible for implementing trust management improvement activities in their respective line organizations.

A consolidated budget is developed and coordinated and under the oversight of the Special Trustee for American Indians, who reviews and certifies plans and budgets in accordance with the American Indian Trust Funds Management Reform Act of 1994.

Standing and Ad Hoc Councils and Committees

During the first year and half of operation of the HLIP, two Standing entities have been created.

1. Records Management Steering Committee

On May 19, 1999, the Assistant Secretary–Policy, Management and Budget approved recommendations made by the Assistant Secretary–Indian Affairs and the Acting Special Trustee for American Indians concerning Indian records management. An Indian Affairs Records Management Steering Committee consisting of the Assistant Secretary–Policy, Management and Budget, the Assistant Secretary–Indian Affairs, and the Special Trustee for American Indians was established. The purpose of the Steering Committee is to resolve any inter-agency disputes that may arise.

2. Policies and Procedures Council

On April 28, 1999, the Assistant Secretary–Policy, Management and Budget established the HLIP Trust Policies and Procedures Council. The Council is composed of the personal representatives of the Assistant Secretary–Indian Affairs, the Special Trustee for American Indians, the Director, Bureau of Land Management, the Director, Minerals Management Service, and the Director, Office of Hearings and Appeals. The Council's responsibility is to carry out appropriate inter-bureau coordination in the establishment of new and revised policies and procedures.

During work on the 11 subprojects the need may arise for the establishment of additional Standing or Ad Hoc Committees or Councils. Such organizations may be created, as appropriate, with the approval of the Assistant Secretary–Policy, Management and Budget.

SUBPROJECT MANAGERS

Below are listed the responsible subproject Managers from the respective Bureaus and Offices. The named individuals have primary responsibility for planning, managing and leading the effort described in the High Level Implementation Plan for designed subprojects.

DATA CLEANUP
OST Data Cleanup . . . . Douglas Lords, OST
BIA Data Cleanup . . . . Dominic Nessi, BIA
Probate Backlog . . . . Charles Breece, OHA, Larry Scrivner, BIA
BIA Appraisals . . . . .Gabriel Sneezy, BIA

SYSTEMS IMPROVEMENTS
Trust Funds Accounting System (TFAS) . . . . Dianne Moran, OST
Trust Asset Accounting and Management System (TAAMS). . . . . Dominic Nessi, BIA
MMS Systems Reengineering . . . . Milt Dial, MMS

RELATED AND SUPPORTING EFFORTS
Records Management . . . . Ken Rossman, OST
Policy and Procedures . . . . Arthur Gary, BIA
Training . . . . Richard Fitzgerald, OST
Internal Controls . . . . Ken Moyers, OST

SUBPROJECT BUDGET ESTIMATE SUMMARY

The following table summarizes the estimates of the subproject funding requirements for Fiscal Years 1997 through 2001.

Summary of Subproject Budget Estimates (Dollars in millions)				
SUBPROJECT	**FY 1997/1998**	**FY 1999**	**FY 2000**	**FY 2001**
OST Data Cleanup	5.9	3.9	2.1	1.5
BIA Data Cleanup	--	10.6	9.8	8.9
Probate	.6	1.0	8.8	9.0
BIA Appraisal Program	--	.4	1.3	2.2
CLEANUP SUBTOTALS	**6.5**	**15.9**	**22.0**	**21.6**
Trust Funds Accounting System	6.2	9.2	17.0	14.2
Trust Asset Accounting and Management System	--	8.1	18.4	12.9
MMS Systems Reengineering	--	1.0	3.0	3.0
SYSTEMS SUBTOTALS	**6.2**	**18.3**	**38.4**	**30.1**
Records Management	.8	1.5	9.6	8.0
Policy and Procedures	--	--	1.0	1.0
Training	.1	.4	5.2	3.0
Internal Controls	2.5	1.9	3.3	3.0
SUPPORT SUBTOTALS	**3.5**	**3.8**	**19.2**	**15.0**
GRAND TOTALS	**16.2**	**38.0**	**79.6**	**66.6**

General Notes
Totals may not add up due to rounding. FY 1997 through 1999 are actual obligations. FY 2000 is the funding currently allocated for each subproject. FY 2001 are funds requested in the President's 2001 Budget Request, and have not yet been enacted by Congress.

Subproject Specific Notes:
Probate. 2001 funding for the probate subproject includes $3.0 million requested in the Bureau of Indian Affairs Budget to phase in permanent staffing for the probate program.

Appraisals. All 2001 funding for the appraisal subproject is requested under the Bureau of Indian Affairs to support permanent funding for the appraisal program.

Training. In late FY 2000, a contract is expected to be awarded to deliver training through 2001 with most of the expenditures occurring in that year.

Appendix

Memorandum

To: Special Trustee for American Indians
           Assistant Secretary - Indian Affairs
           Deputy Commissioner for Indian Affairs
           Director, Minerals Management Service
           Director, Bureau of Land Management

From: The Secretary

Subject: Trust Improvements Project Definition

I have met with the Special Trustee for American Indians and discussed at length the recommendations contained in the Special Trustee's April 11, 1997 Strategic Plan. Notwithstanding my reservations about certain aspects of his Plan, selected trust systems improvements and data cleanup efforts in the Plan can and should proceed as soon as possible within the organizational structure of the Department. This memorandum outlines the Department's approach for improving Indian Trust Management and engages affected Bureaus and Offices in the implementation planning and execution activities necessary to ensure success. The Special Trustee and I have agreed to the following.

Trust Management Project Scope

1.   **Data and Backlog Cleanup.** Our goal is to eliminate bad data and overcome backlogs to ensure Indian trust records are accurate and up to date. Projects either needed, planned, or currently underway in the Department (principally in the Office of Trust Funds Management, the Bureau of Indian Affairs (BIA), and the Office of Hearings and Appeals (OHA)) to clean up trust and trust funds-related files and data are a high priority, and are to proceed in a coordinated fashion.

2.   **Individual Indian Monies (IIM) Accounting System.**   The Office of the Special Trustee, in coordination with the Department's Chief Information Officer, is to acquire, pilot, and install a Core Trust Accounting System (also referred to as the IIM Accounting System) module, suitable for both Tribal and IIM accounts.

3.   **Trust Asset and Accounting Management System.** The Office of the Special Trustee, in coordination with the Department's Chief Information Officer, and the heads of the BIA, BLM and MMS, will evaluate, acquire, and pilot standardized, commercial off-the-shelf general trust management system technology to the extent practicable. Following successful testing and piloting, full implementation will proceed. The supporting land title and records and minerals royalty systems, such as the BIA's LRIS system will also be evaluated and upgraded, as appropriate.

4.   **Related Activities.** Supporting efforts will also be evaluated, to include a joint trust records management solution (which may include electronic records/imaging technology), developing and issuing policy and procedures manuals, providing staff and user training, and improving internal controls.

5.   **Duration.** The Special Trustee and I have agreed that the trust management improvements should occur within a three year period, beginning in 1998.

6.   **Excepted Issues.** It is further agreed that the Special Trustee's Strategic Plan recommendations in the following areas are specifically deferred in this agreement and the scope of the project.

a.   New management and organization structures outside of the Department of the Interior.

b.   Introducing new trust products or services based on the prudent investor rule.

c.   An Indian development bank.

The fractionation of Indian lands issue also needs to be resolved. The Congress has the Administration's recommended proposal on fractionation for further consideration.

Project Management/Oversight

Management of Indian trust lands and Indian trust funds is a Departmental mission, and responsibility for its accomplishment rests with me. The Special Trustee, with the full participation of other Departmental officers, will take the lead in developing a high level Implementation Plan and overseeing its execution. The project will be performed under the guidance and oversight of a steering committee that I or the Chief of Staff will chair. The steering committee will be comprised of the Special Trustee, the Solicitor, the Assistant Secretaries - Indian Affairs, - Land and Minerals Management, and - Policy, Management and Budget, and the Chief Information Officer.

The Chief Information Officer will provide Departmental oversight on the systems and information resources management aspects of these efforts. All trust system acquisitions will be accomplished in compliance with the Clinger-Cohen Act and implementing Raines Rules.

Following development of the high level Implementation Plan, respective Bureau and Office heads are individually responsible for implementing trust management improvement activities in your respective line organizations.

Resources

The Special Trustee and I have agreed that the Office of Special Trustee will initiate the trust system and records cleanup efforts outlined above with funds appropriated to the Special Trustee in FY 1997 and FY 1998. Similarly, the BIA trust systems, records management, and data/probate cleanup initiatives will be funded with FY 1997 and FY 1998 funds appropriated for those purposes. In addition, a consolidated budget will be developed and coordinated and under the oversight of the Special Trustee, who will review and certify plans and bureau budgets in accordance with the American Indian Trust Funds Management Reform Act of 1994.

Budgetary requirements relating to this effort in the FY 1999 and FY 2000 time frames will be coordinated and addressed jointly to the Congress by the Department, the Office of the Special Trustee, and the BIA.

Outreach/Consultation/Coordination

An Outreach and Consultation Plan designed to reach and inform affected account holders, Indian Tribes and the Congress will be developed and executed in support of the trust management improvements.

Next Steps

Over the next 30 - 60 days, you will work jointly to prepare a high level implementation plan and schedule for acquiring and implementing trust systems and completing records cleanup. The plan must have the concurrence of the heads of key affected bureaus and offices, include sufficient information to satisfy Clinger-Cohen Act requirements, and provide satisfactory detail to guide, at a high level, trust improvement efforts. It must identify sub projects, tasks and task work plans, resource estimates, accountable officials and measures by which results will be judged. The Office of the Special Trustee will take the lead, but I expect affected and key bureaus and offices to work closely with the Special Trustee, cooperating and participating fully in drafting and publishing the high level implementation plan.

My goal--and your responsibility--is to build success so that full implementation of the new trust systems can occur over a three year period starting in 1998, enabling the Department to fulfill its trust responsibilities to the Indian peoples and to comply with the American Indian Trust Fund Management Reform Act of 1994.

cc: AS-PMB
       AS-LM
       DAS-PMB for Budget & Finance
       CIO
       PIR
       POB